

PEER REVIEW REPORT

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

FINLAND

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1. EXECUTIVE SUMMARY

Statistics Finland is the main producer of official statistics in Finland. It has a strong legal mandate and enjoys a high level of trust; its independence and impartiality are widely recognised and unchallenged.

Statistics Finland has a longstanding commitment to quality and has developed a highly efficient production process, most of which is devoted to the production of European statistics. This seems likely to have contributed to a more production-oriented approach rather than user-oriented one. Statistics Finland meets regularly with some of the main users, such as researchers, and their needs are taken into consideration. However, the Peer Review team considers that to further enhance compliance with the European statistics Code of Practice (CoP) Statistics Finland should engage more proactively with a wider range of users, such as in business and the media, and make effort to encourage the wider use of statistics. In particular, special attention should be paid to the clarity and accessibility of statistical releases. To reinforce the voice of the users, the Peer Review team considers it useful to establish a Statistical Council, opened to all categories of users to organise dialogue between producers and users of official statistics, ranging from identification of areas to be covered to evaluation of statistical operations.

The Finnish statistical system relies heavily on the use of administrative sources. This approach has the advantage of increasing cost-effectiveness and lowering the response burden borne by respondents to statistical surveys. However, the model leaves the organisation highly dependent on the quality, the stability and the completeness of these sources, which makes the system vulnerable to changes in these characteristics. The Peer Review team considers that the sustainability of the system should be strengthened and several recommendations in this report are intended to support this orientation. In particular, official statistics should be considered as one of the purposes of the main administrative registers, and data sharing agreements should include systematic consultation of Statistics Finland in the case of proposed system changes.

Like many other National Statistical Institutes (NSIs), Statistics Finland is facing budget cuts. Since much has already been done to improve cost-effectiveness, there is risk that Statistics Finland might not have much room to absorb further reductions. To mitigate the impact of reduced resources, the Peer Review team recommends that Statistics Finland prepares a mid-term investment programme as a basis for negotiation with the Finnish budgetary authorities.

Statistics Finland plays a leading coordination role in relation to the other producers of official statistics. The Peer Review team considers that this role could be extended to enhance the visibility of the National Statistical System (NSS), for example by setting up a well-branded web portal to all official statistics; and to spread the culture of quality within the system, through training on quality management for other producers of official statistics or by promoting the practice of quality audits by other statistical authorities.

Finally, the Peer Review team has identified some innovative practices of Statistics Finland that could benefit the European Statistical System, such as the Survey laboratory which evaluates and tests survey questionnaires in household and business surveys using various methods, or the extended cooperation with universities, including the financing of a professorship.

Generally, the Peer Review team considers that Statistics Finland, and the other Finnish authorities involved in the production of European statistics, have a high level of compliance with the CoP.

RECOMMENDATIONS

Reinforce the voice of the users

1. The Statistics Act should be amended to establish a Statistical Council, with external users' representation (European statistics Code of Practice, Principles 9 and 11).
2. Statistics Finland and the Other National Authorities should prepare and publish annual work programmes and performance reports accessible for the general public, and present them to the Statistical Council (European statistics Code of Practice, indicators 1.5 and 11.2).
3. Statistics Finland should develop more proactively its relations with users and should identify new potential categories of users (European statistics Code of Practice, indicators 11.1 and 11.2).
4. Statistics Finland should continue its efforts to use social media as a vehicle to reach new users and get feedback (European statistics Code of Practice, indicator 15.2).
5. The existing sample survey of users should be supplemented with by a more focused survey or interviews directed at key users (European statistics Code of Practice, indicator 11.3).

Ensure the sustainability of the National Statistical System

6. Statistics Finland should conduct a risk assessment of the extent to which changes in key administrative data sources could affect the efficiency of its statistical production (European statistics Code of Practice, indicator 10.3).
7. The data-sharing agreements between Statistics Finland and administrative data owners should, as far as practicable, take account of the changes that could affect official statistics (European statistics Code of Practice, Principle 2, indicators 8.8, 8.9, and 10.3).
8. Finnish authorities should consider the feasibility of reinforcing the legal framework to take account of the requirements of official statistics. In particular, official statistics should be considered as one of the purposes of the main administrative registers. Reasonable advance notice should be given in the case of proposed system changes, and Statistics Finland should be consulted before changes are finalised (European statistics Code of Practice, indicators 2.2, 8.7, 9.3, 9.4, 9.5, and 10.3).
9. Statistics Finland should prepare a mid-term investment programme as a basis for negotiation with Finnish authorities in order to mitigate the impact of unplanned reduction in resources (European statistics Code of Practice, indicators 3.1, 3.2, and 3.3).
10. Statistics Finland should intensify staff mobility and promote in particular the mobility of newly recruited staff (European statistics Code of Practice, indicators 3.1 and 7.6).
11. Statistics Finland should continue standardising processes where Information and Communication Technologies solutions or new technologies would increase overall productivity (European statistics Code of Practice, indicators 10.2 and 10.4).
12. Statistics Finland should promote a project aiming at identifying the statistical potential of new data sources (big data), at promoting the change in the legal framework to allow access, and at upgrading production systems to allow its use (European statistics Code of Practice, Principles 2, 8, 9, 10, 11, and 13).
13. To increase response rates, Statistics Finland should improve information and communication regarding the purposes and value of surveys (European statistics Code of Practice, indicator 8.4, Principle 9).

Further improve quality management and confidentiality and extend them to the whole statistical system

14. Statistics Finland should reinforce users' perspective in its quality audits (European statistics Code of Practice, indicators 6.1, 6.2, 6.3, and 6.4).
15. Statistics Finland should upgrade accessibility, completeness and readability of its quality reports (European statistics Code of Practice, indicators 15.1, 15.5, and 15.6).
16. Statistics Finland should include quality criteria in the measurement of its performance (European statistics Code of Practice, indicator 15.7).
17. Statistics Finland should develop training on quality management, quality assurance and quality reporting for other producers of official statistics in the National Statistical System, and in particular their new staff (European statistics Code of Practice, Principle 4).
18. Statistics Finland should promote the practice of systematic quality audits by Other National Authorities, and foster the participation of external reviewers in the auditing process (European statistics Code of Practice, Principle 4).
19. Statistics Finland should ensure that, when processing or combining personal data, surrogate codes rather than actual personal identifiers are used to the greatest possible extent (European statistics Code of Practice, indicator 5.5).

Improve dissemination and the prominence of official statistics

20. An editorial function (a dedicated editor with the required skills, or an editorial board) should be established to examine releases critically and to provide feedback and follow-through to authors (European statistics Code of Practice, Principle 15).
21. Statistics Finland should further improve the accessibility of its website, using responsive web design adapted to various sizes of screens, developing a mobile version, and providing a more user-friendly access to the tables (European statistics Code of Practice, indicator 15.2).
22. The quality marks to identify official statistics should be extended to data collection operations, for example by inserting the logo on questionnaires and information documents (European statistics Code of Practice, Principle 4, indicators 11.1 and 15.7).
23. Statistics Finland should set up a well-branded web portal to all official statistics, including a single calendar covering all of Finland's official statistics (European statistics Code of Practice, Principles 11 and 15).

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).

¹ The 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 Finnish peer review was conducted by Mr Jean-Michel Durr (chair), Ms Isabelle de Pourbaix and Mr Adrian Redmond, with a peer review visit to Helsinki on 25–29 August 2014. The programme of the visit is in Annex A and the list of participants in Annex B.

This report focuses on compliance with the CoP and the coordination of European statistics within the Finnish statistical system. The report highlights some of the strengths of Statistics Finland in these contexts and contains recommendations for improvement. Improvement actions developed by Statistics Finland 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

Legislation

The Statistics Act (280/2004) regulates the “procedures and principles concerning the collection of data and the designing and production of statistics that shall be applied by state authorities in their statistics compilation” (Section 1). It identifies authorities, Statistics Finland and the other bodies forming the National Statistical System (NSS), and also defines “other authorities producing statistics” as “state authorities who produce statistics concerning their branch of administration from data in their possession collected for other purposes or from data collected on voluntary basis for statistical purposes” (Section 2). The Statistics Act contains special provisions on the Autonomous Territory of the Åland Islands’ tasks in the field of statistics. The Statistics Act makes reference to the Personal Data Act in relation to the protection of personal data during the compilation of statistics, and to the Act on the Openness of Government Activities, which deals with the duty of public authorities to properly inform the general public about their processes and activities. The Statistics Act has been amended in recent years to take into account the changes in the Regulation on European statistics.

Further legal elaboration is provided in the Statistics Finland Act (48/1992) and the Council of State Decree on Statistics Finland (1063/2002).

Mission and vision of Statistics Finland

The mission of Statistics Finland is to support democratic decision-making based on facts, as well as scientific research, by producing reliable statistics, studies and datasets describing society. Statistics Finland develops the national statistical service in cooperation with other Government officials. Statistics Finland is committed to produce reliable statistical data for users' changing information needs. The vision expresses the agency's aspiration to respond well to the changes taking place in society and to base its operations on the information needs of data users.

Status of Statistics Finland in the public administration system

Statistics Finland acts as the general statistical authority in the public administration system. The Statistics Act states that the primary exploited sources to produce statistics shall be data from various Government administrations. It has thus important links with other bodies of the public administration and holds essential coordination competence in the NSS.

Statistics Finland operates in the administrative sector of the Ministry of Finance. The statistical legal framework has provisions to ensure that Statistics Finland and other authorities that compile official statistics operate independently, objectively, reliably and cost-efficiently, and that they ensure the protection of statistical confidentiality. Statistics Finland is financed by the State Budget, and manages their allocation independently. The 2013 budget amounted to about €65m, of which about €50m was granted from the State Budget for operating expenses. Income from charged activities and from other national or international bodies generally represents around 20% of the operating expenses.

Appointment of the Head of NSI

The head of Statistics Finland is the Director General, recruited through open competition. The requirements for the post are specified in Section 4 of the Council of State Decree on Statistics Finland: “*a higher level academic degree, management skills and management experience proven in practice as well as broad-based experience required by the position*”. The Director General is nominated

by the Council of State upon recommendation made by the Ministry of Finance for a fixed seven-year term, which is renewable. The Director General has the same rank as top officials in government departments. Dismissal conditions for a Director General are the same as for any other senior civil servant, and are set out in the Civil Servants' Act (750/1994).

Organisational structure

Statistics Finland is a centralised office located in Helsinki. It previously had four regional offices (employing 12 staff) mainly responsible for local customer relations and the marketing of services. Statistics Finland has progressively been closing all its regional departments, with the last regional office to be closed by the end of 2014.

Statistics Finland currently has a staff of about 820 (full-time equivalents), of which data collection interviewers account for about 130. About 40 persons of the staff are on temporary assignment.

Statistics Finland has nine departments: the Office of the Director General, and three core departments (Standards and methods, Administration, Information Technology) that service the five other departments which deal with data collection, compilation and dissemination. All data collection, including the receipt of administrative registers, is progressively migrating to the Data Collection Department. Production is divided among three departments: Population and Social statistics, Economic and Environmental statistics, and Business statistics. The Communication and Information Services Department deals with dissemination and customer relation issues.

National Statistical System (NSS)

Statistics Finland acts as the general authority of the NSS. The other three statistical authorities defined in legislation are the Information Centre of the Ministry of Agriculture and Forestry, Finnish Customs, and the National Research and Development Centre for Welfare and Health. The Information Centre of the Ministry of Agriculture and Forestry will merge with three other institutions at the beginning of 2015 to form the Natural Resources Institute of Finland. The other institutions involved are Agrifood Research Finland, the Finnish Forest Research Institute, and the Finnish Game and Fisheries Research Institute.

Other NSS institutions producing European statistics include the Finnish Transport Agency, the Finnish Transport Safety Agency, the Finnish Institute of Occupational Health and the Finnish Immigration Service.

Statistics Finland has set up the Advisory Board of Official Statistics of Finland, which includes representatives from all statistical authorities and focuses on the consistency, quality and relevance of the NSS. Statistics Finland has also its own Advisory Board, which was established by the Council of State Decree on Statistics Finland, and whose main role is to support the strategic management of Statistics Finland.

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

This section summarises the Peer Reviewers' views on the extent of CoP compliance and the nature and effectiveness of coordination within the NSS. It first summarises Statistics Finland's strengths in these respects, and then explores specific issues including making recommendations that the Peer Reviewers consider would strengthen compliance with the CoP.

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

Statistics Finland has a very strong legal mandate in the Statistics Act (CoP Principle 2). They have access to the administrative records of public authorities, and indeed are obliged whenever possible to use such sources in preference to direct surveys (CoP indicator 2.2). According to the Act (Section 4): *"When data are collected for statistical purposes the primary exploited sources shall be data accumulated in administering the tasks of general government and those produced as a consequence of the normal activities of employers, self-employed persons, corporations and foundations"*. As a result, they use registers very extensively, and there is close cooperation between Statistics Finland and the providers of administrative data (CoP Indicators 8.7, 8.8, 8.9, and 10.3).

Statistics Finland and the other statistical authorities have the power to make it obligatory to respond to statistical surveys (CoP indicator 2.3). They can do this without the need for new legislation, but only after consultation with the respondents or their representatives. This power applies to surveys of enterprises and institutions; it does not extend to household surveys, which are always voluntary.

All business surveys are mandatory and they get a high response rate, usually over 90% (CoP indicator 2.3). There is a system of legal sanctions in place, but these sanctions have not been used for some time because the process of sanctioning was cumbersome. However the revised Statistics Act simplifies this procedure, allowing Statistics Finland to impose fines by itself. Accordingly, Statistics Finland is now considering using sanctions again. The Finnish Customs, who conducts the Intrastat survey, operates under the Customs Act, which allows them to give penalties for non-response or late response, and they apply this to about a hundred cases each month.

The Statistics Act also ensures the professional independence of the statistical authorities (Section 2): *"Statistical authorities and other authorities that compile statistics are professionally independent when performing tasks directly connected to developing, producing and disseminating statistics. These authorities shall operate independently, objectively, reliably and cost-efficiently, and ensure the protection of statistical confidentiality."* (CoP Principle 1).

It was clear to the Peer Review team, from discussions with staff, the media, ministries and other stakeholders, that Statistics Finland's independence is unchallenged and widely recognised, and that it enjoys a high level of trust (CoP Principle 6).

Releases from the statistical authorities are published on the basis of their calendars, and are available at the same time to all users (CoP indicator 6.5). Nobody gets pre-release access (CoP indicator 6.7).

Statistical coordination within Finland is strong. Statistics Finland is the reference institution in a statistical system organised as a network of authorities responsible for the production and

publication of official statistics. The functioning of the network is characterised by a range of formal and informal methods of cooperation. In practice, the system works very well. Statistics Finland provides advice and training, and their guidelines are largely followed. All statistics producers signed the "*Quality Assurance of Official Statistics of Finland*" at the start of 2013, committing themselves to the principles that steer statistical production (CoP Principle 4), and in general there are formal agreements between Statistics Finland and the producers and register owners.

Cooperation is reinforced by many expert groups in areas such as national accounts, prices, external trade, and agriculture. An important role is played by the Advisory Board of Official Statistics of Finland. The Board, which includes representatives from all statistical authorities, focuses on the consistency, quality and relevance of the NSS (CoP Principles 4 and 11). The Board also assigns the conformity label or quality mark that identifies a statistic as being an official statistic and thus accessible via Statistics Finland's portal of official statistics. The Ministry of Finance has set up a cooperative group on EU matters in the field of statistics, in which general EU matters affecting the NSS, coordination between administrative branches in the field of statistics, and preparation of Finland's positions on statistical legal acts are discussed and agreed.

There is a long tradition of Nordic cooperation in the field of statistics. There are regular meetings at Director General level, the Nordic Statistical Conference is held every three years, and there are many contact networks in different statistical areas. The cooperation involves sharing best practices as well as jointly working to develop new systems. An example of Nordic cooperation in the field of statistics is the development of the PC-Axis software package: the project began in Sweden, with Denmark, Norway, Iceland and Finland joining later to participate in the development work.

Quality management is strong (CoP Principle 4). There is a clear organisational structure for managing quality, and this is supported by regular monitoring, training, procedures and documentation (CoP indicators 4.1, 4.2, 4.3, and 4.4). As a result, the quality of the published output is good. Punctuality is also good: an analysis for the first half of 2014 showed that 99% of releases were published on time (CoP Principle 13). If a release is delayed after the weekly calendar is published, information about the delay is posted prominently on Statistics Finland's home page.

The Peer Review team formed the impression that Statistics Finland is managed efficiently, has highly educated and well-motivated staff, and has a very participative culture. The junior staff met by the Peer Reviewers are highly educated, good communicators, happy with the organisation and their status, and receive good training.

Statistics Finland has a range of facilities for providing access to microdata for researchers: sample data can be released to the researchers; data can be accessed onsite at the research laboratory; and data can be accessed offsite via remote access (CoP indicator 15.4). Generally, researchers are satisfied with the service and in particular with the ability to access data remotely; while remote checking necessarily introduces a delay, this is usually less than a day.

The Peer Review team identified the following innovative practices:

- Survey laboratory

For the past 15 years, Statistics Finland has had a Survey Laboratory, which evaluates and tests survey questionnaires in household and business surveys using qualitative methods such as focus group interviews, expert panels, cognitive interviews and behavioural coding. The laboratory is equipped with video and computer facilities, and follows international developments to bring new methods into use.

- Cooperation with universities

Statistics Finland has an agreement with the University of Helsinki, to finance a five-year professorship of two professors. One of them spends 30% of total work time on research and development at Statistics Finland and the other 25%. In addition, 3 to 7 students of economics are hired annually by Statistics Finland to work on their Master's theses on topics of interest to Statistics Finland. So far, topics have ranged from the revision process in the GDP to construction price indices.

4.2 ISSUES AND RECOMMENDATIONS

4.2.1 *Reinforce the voice of the users*

Statistics Finland has developed a highly efficient statistical production process, for the most part devoted to the production of European statistics. This seems likely to have contributed to a more production-oriented approach rather than user-oriented one. This chapter tackles the issue of listening to the voice of the users, and how it could be improved through:

- The establishment of a Statistical Council;
- Giving more visibility to work programmes and performance reports;
- Developing relations with all categories of users.

4.2.1.1 STATISTICAL COUNCIL

According to the Statistics Act, the task of the National Statistical System is to produce for general use statistics describing social conditions and their development. The objective is to ensure the availability of reliable statistical information required in social decision-making and planning and in fulfilling obligations under international statistical cooperation. As presented in its strategy for 2012-2015, Statistics Finland's vision is "*Reliable statistical data flexibly for users' changing information needs*".

Therefore, it is of high importance that Statistics Finland listens to the voice of the users, and collects their needs in an efficient and regular manner. It is also necessary that the consultation of the users be conducted in a formal way to legitimise decisions and priorities given in the statistical work programme (CoP indicators 11.1 and 11.2).

In addition, in a context of budget reduction and growing demand for statistical information, it is essential that the strategic decisions and priorities of the work programme take into consideration the needs and recommendations of users.

Statistics Finland has an Advisory Board to support its strategic management, composed of the Director General, seven members and three permanent experts. The current membership includes the Director of the Labour Institute for Economic research, the Director of the Population Register Centre, the Director of the Finnish Innovation Fund, a journalist from a financial newspaper, a university professor, the Chief Secretary of the Ministry of Employment and the Economy (chair) and a senior adviser from the Ministry of Finance. However, notwithstanding the undoubted expertise of the current members, this Advisory Board cannot be considered as playing the role of a Statistical Council. Firstly, the number of external users represented is rather limited and does not cover the scope of potential users of statistics in Finland. Secondly, members do not have an explicit mandate to represent their group, and for example researchers interviewed by the Peer Review team did not know the name of the academic member of the board. Finally, the discussions of the Advisory Board are internal and its decisions are not published. However, the minutes are publicly available in the registry office.

It was mentioned to the Peer Review team that Statistics Finland has a large number of user groups at expert level. These groups gather experts of Statistics Finland and the main users, mostly from the public sector, and are considered as fora for user consultation. Although these groups are undoubtedly useful, they are not set up on an open basis and they target intensive users for whom the benefit is worth the time they invest.

It was reported to the Peer Review team that a Statistical Council existed from 1954 to 1992 with two main duties:

- To give statements on how to develop government level official statistics, their financial planning and other similar questions and development activities;
- To follow the information needs of society and evaluate how those are being met by the official statistical service as well as to make proposals on how to systematically develop statistics and administrative registers.

The main activity of this Statistical Council was to exchange information between Statistics Finland and other producers of statistics. This role is now held by the Advisory board of Official Statistics of Finland. In the late 1980s it was felt that the Council was not the best way for fulfilling its main duty, and much of the activity had already been moved to specific cooperation groups established by Statistics Finland's departments.

To reinforce the voice of the users in a more efficient way, the Peer Review team considers it useful to establish a real Statistical Council, open to all categories of users, including from the civil society (business, non-governmental organisations, professional and workers unions, media, etc.) with the following mission:

- To organise dialogue between producers and users of official statistics, ranging from identification of areas to be covered to evaluation of statistical operations;
- To provide opinions and recommendations regarding the programmes of work of the NSS;
- To provide a detailed follow-up of the opinions issued in the previous year and assessments of the work programmes carried out by statistics producers (annual and mid-term);
- To set up thematic task forces to examine particular topics in detail and provide recommendations to the Council;
- To promote public seminars on particular topics related to official statistics (new areas, new data collection methodologies, dissemination, confidentiality...) or where controversial issues can be discussed in an impartial manner, such as the measurement of inflation or unemployment;
- To give recommendations in the sphere of statistical legislation.

To further enhance compliance with the CoP by organising the NSS in a more user-oriented way, **the Peer Reviewers recommend that:**

- 1. The Statistics Act should be amended to establish a Statistical Council, with external users' representation (European statistics Code of Practice, Principles 9 and 11).**

4.2.1.2 VISIBILITY OF WORK PROGRAMMES AND PERFORMANCE REPORTS

Statistics Finland's performance targets are discussed within its Advisory Board and also with the Ministry of Finance, its line ministry, for budget, human resources and major production changes and

development projects. The work programme as well as the performance agreement, operational and financial plan and budget proposal are published in Finnish, while only some descriptions about planning, monitoring and development, and the release calendar, are published on the website in Finnish and English. In addition, a four-year strategy document is published, describing the key development objectives, but not detailing on the users' needs as regards products and services and on plans in the various statistical domains.

The performance report released is only related to the performance agreement signed with the Ministry of Finance, which largely concentrates on budget and human resources, but also takes into account the volume of production with quality measures, customer feedback, projects and other development work.

Performance reports to the stakeholders were prepared and published on the website until 2011 (these were called annual reports), but have been discontinued since then. Statistics Finland states that the change was due to the fact that interest in the printed annual report collapsed, that the usage of the Internet version was minimal as the users did not consider that kind of reporting relevant, and that users preferred more up to date and accurate information on the changes and activities. For these reasons, Statistics Finland does not consider the traditional annual reports to be a relevant means of communicating. A comprehensive work programme and the performance reports are published on the website. The development of the national statistical service is reported annually.

To support the dialogue with stakeholders, the Peer Reviewers consider it essential to discuss openly the work programme of the producers of official statistics and their performance reports afterwards, including highlights of the year, new operations, main operations, main quality indicators, budget, staff, etc.

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

2. **Statistics Finland and the Other National Authorities should prepare and publish annual work programmes and performance reports accessible for the general public, and present them to the Statistical Council (European statistics Code of Practice, indicators 1.5 and 11.2).**

4.2.1.3 DEVELOPING RELATIONS WITH ALL CATEGORIES OF USERS

Statistics Finland has developed a network of main users, in public administration, in some local authorities such as the municipality of Helsinki, and in universities and research centres. However, due to the particular situation of the capital city, located at the southern tip of the country, contacts with users located in other parts of the country are less frequent. For example, rural municipalities may have some specific needs that cannot be conveyed by large urban municipalities. They may also not be aware of the use they can make of statistical information in their activities. The same may apply to business companies, non-governmental organisations or other components of the civil society.

During the visit, the Peer Review team was not convinced that systematic efforts were carried out by Statistics Finland and other producers of official statistics to reach all categories of potential users in a pro-active way, to identify possible uses of statistical information, or to develop dissemination products adapted to specific needs.

Statistics Finland conducts every two years a user satisfaction survey of a sample of users and stakeholders. Due to the short questionnaire and the low response rate, the survey provides only general information about the level of satisfaction and the services expected from Statistics Finland.

The media representatives interviewed by the Peer Review team reported that they would appreciate more reactivity from Statistics Finland to topical issues, such as the impact of recent international events on the Finnish economy. More regular contacts with the media would allow Statistics Finland to listen and react to their statistical needs.

Statistics Finland is now present on the social networks, and has developed a blog where its staff can provide explanations to or complement statistical information in an unofficial capacity. This and the use of social media generally, provide a very useful way for Statistics Finland to reach new users, and to get their feedback. However, the blog does not appear to generate much interest or debate, possibly because it is not promoted: a user has to be committed and dig deep on the Statistics Finland website before coming across a reference to the blog. This deserves to be publicised prominently on the website.

The Peer Review team considers that Statistics Finland would benefit from enlarging the scope of its relations with users, for instance:

- By participating in gatherings organised by specific categories of users (such as annual meetings of municipalities or professional organisations) to present its activities and collect information on their needs;
- By developing regular encounters with journalists (for example at informal breakfasts);
- By visiting specific categories of users to understand their daily work and identify what statistical information or products could help them;
- By further developing and promoting the use of social media to reach a wider public in a user-friendly manner.

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

3. **Statistics Finland should develop more proactively its relations with users and should identify new potential categories of users (European statistics Code of Practice, indicators 11.1 and 11.2).**
4. **Statistics Finland should continue its efforts to use social media as a vehicle to reach new users and get feedback (European statistics Code of Practice, indicator 15.2).**
5. **The existing sample survey of users should be supplemented with by a more focused survey or interviews directed at key users (European statistics Code of Practice, indicator 11.3).**

4.2.2 *Ensure the sustainability of the National Statistical System*

This chapter tackles the issue of sustainability of the NSS, which means the resilience of its internal subsystems and processes against turbulences and changes. The current system is assessed around three pillars considered by Peer Reviewers as cornerstones of sustainability:

- The register-based production model;
- The availability of resources;
- The changing environment for producing statistics.

4.2.2.1 STRENGTHEN THE REGISTER-BASED PRODUCTION MODEL

Assessing the risk of unplanned or potentially harmful changes in administrative data

Statistics Finland rightly makes extensive use of administrative data for the production of statistics. This approach has the advantage of increasing cost-effectiveness and lowering the response burden borne by respondents to statistical surveys. However, the model leaves the organisation highly dependent on the quality, the stability and the completeness of these sources, which makes the system vulnerable to changes in these characteristics.

While the Statistics Act compels holders of administrative registers to share their data with Statistics Finland, the current regulatory framework does not specify conditions pertaining to this data sharing. For the main administrative data owners, the legal Act only stipulates, for example in the case of state authorities (Chapter 5 of the Statistic Act), that: *"Notwithstanding the provisions on secrecy, state authorities shall be obliged to provide Statistics Finland with such data in their possession that are necessary for the production of statistics,..."*.

There is therefore a risk that variables could be changed or removed if they were not needed anymore by a particular administration – thus affecting the production of statistics that rely on them. This risk could intensify with policy changes or with administrative budgetary constraints. Recent administrative changes have affected:

- The collection of data on occupations;
- Information on employed persons under 18 years of age.

It would be beneficial to identify, for each key administrative source used, the risks linked to change or removal of variables, the probability of occurrence, the impact, and possible preventive, mitigating or corrective actions.

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

- 6. Statistics Finland should conduct a risk assessment of the extent to which changes in key administrative data sources could affect the efficiency of its statistical production (European statistics Code of Practice, indicator 10.3).**

Improving data sharing agreements and the legal basis for administrative data collection

Statistics Finland has started revising its data sharing agreements with the various administrative data providers. In the draft agreement between the Population Register Centre and Statistics Finland shown to Peer Reviewers, some provisions seem unsatisfactory from the point of view of official statistics. For example, the draft states *"The Population Register Centre shall inform Statistics Finland without delay of anticipated or planned changes in data contents or form of data delivery..."*, without specifying the anticipation period. The fact that the decision to modify administrative data content rests solely with the administrative data owner, indicates that statistics are not fully recognised as one important purpose of administrative operations.

When a public administration is investing in the use of administrative data for producing statistics, it has an important return on its investment with the availability of harmonised and quality statistics it needs for its own governance purposes. Also, if important statistics from administrative sources are affected, the costs of alternative data collection using surveys would be substantial, decreasing efficiency and quality, and increasing costs and the burden on respondents.

Agreements with the providers of administrative data give the opportunity to raise awareness about the weakness of the current system in this regard and to enhance the place and role of official statistics in the general public administration activities. The data sharing agreements should provide for reasonable advance notification of system changes, and should provide for Statistics Finland to give its views before changes are finalised.

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

7. **The data-sharing agreements between Statistics Finland and administrative data owners should, as far as practicable, take account of the changes that could affect official statistics (European statistics Code of Practice, Principle 2, indicators 8.8, 8.9, and 10.3).**
8. **Finnish Authorities should consider the feasibility of reinforcing the legal framework to take account of the requirements of official statistics. In particular, official statistics should be considered as one of the purposes of the main administrative registers. Reasonable advance notice should be given in the case of proposed system changes, and Statistics Finland should be consulted before changes are finalised (European statistics Code of Practice, indicators 2.2, 8.7, 9.3, 9.4, 9.5, and 10.3).**

4.2.2.2 ANTICIPATE THREATS ON RESOURCES

Anticipate further budget cuts and identify mid-term investments

Statistics Finland has already set up an impressively efficient organisation. Paradoxically, this strength might turn into a weakness as the institution has consumed its room for manoeuvre to increase cost-effectiveness when it comes to face further budget cuts. Indeed, a lot has been already achieved and planned — or is currently under implementation — as regards rationalisation of the organisation, such as:

- Internal reorganisation with the centralisation of data collection;
- Closure of Regional Offices;
- Standardisation of processes (Central meta-database; standardisation of main ICT tools, ...);
- Suppression of some data collection;
- Cooperation with universities in training and methodological issues;
- Implementing performance management models and tools.

Measures, such as these, aimed at creating gains in productivity should be continued. But there is a limit to what can be achieved, and in the meantime Statistics Finland faces an increasing demand in some sectors such as national and government accounts. In order to plan and secure the future in an economic sense, the 2012-2015 strategy takes finance into account: one of the strategic objectives is stable budget development. While the strategy document is signed by the Minister, financing is decided annually by the Parliament. Moreover, there is a rolling four year framework plan, which covers emerging financial needs.

Resource challenges can provide a valuable incentive for creativity and modernisation as long as a minimum level of investment to implement new ideas and methods is permitted. Longer-term planning would enable:

- Identifying investment possibilities and measuring their cost-effectiveness;
- Better sharing of resources among all stakeholders of the NSS;

- Preventing the production system from unexpected shortfalls;
- Inserting priorities in a larger national frame.

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

9. **Statistics Finland should prepare a mid-term investment programme as a basis for negotiation with Finnish authorities in order to mitigate the impact of unplanned reduction in resources (European statistics Code of Practice, indicators 3.1, 3.2, and 3.3).**

Promoting the mobility of human resources

Staff of Statistics Finland can benefit from a wide range of organised or personal training initiatives. New staff joining the organisation have to attend five days of basic training, and staff having several years of service are encouraged to participate in advanced training to deepen their expertise in methodology or other specific fields.

Many other measures are used to enhance the knowledge of the staff in a lifelong learning process:

- Tailored trainings on specific areas (such as national accounts);
- Traineeships for Master Degree students;
- Appraisal system taking training needs into account;
- Use of internal seminars to further disseminate knowledge and experiences;
- Participation in the European Statistical Training Programme (ESTP);
- Support for private study initiatives in the form of leave or payment of course fees;
- Specific training on management for higher level staff;
- Coaching and peer tutoring.

In total, members of staff are said to invest on average 7 to 8 days a year in educational processes.

Statistics Finland has highly qualified staff and a very participative and dynamic human resources policy. Personal development needs of employees are assessed during the regular appraisal interviews. The Peer Review team was informed that Statistics Finland intends promoting staff mobility as a valuable measure to foster its capacity to adapt to changes and to maximise the use of its existing workforce. Internal mobility covers internal labour market, job rotation and replacement of staff that have left.

Current mobility happens mostly internally, although some cases of staff exchange with other institutions of the NSS are reported.

Proper management of employees' mobility is important, because without the right training and planning, employees moving to other units or departments will not be prepared to meet the challenges that such moves present and this might affect productivity. The Peer Review team suggests that Statistics Finland should foster the mobility of newly recruited staff with some measures requiring that staff members change position in the first years of employment, for example limiting the duration of holding a given position.

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

10. **Statistics Finland should intensify staff mobility and promote in particular the mobility of newly recruited staff (European statistics Code of Practice, indicators 3.1 and 7.6).**

Harmonising and standardising Information and Communication Technologies (ICT) systems

The Peer Review team was told that Statistics Finland is implementing a new ICT strategy for 2015-2017 aimed at developing a harmonised and more service-oriented architecture. Current use of open-source software packages for data collection and data dissemination as well as the use of hand-held devices for data collection were mentioned as examples of rationalisation of resources.

New data collection methods, such as Internet data collection, are envisaged to reduce the current costs of field or telephone data collection. Some data are now starting to be collected automatically from electronic systems; for example accommodation data are being extracted from hotels' management systems, and the tax authorities are starting to extract some data directly from companies' accounting systems.

Although several systems have already been harmonised and standardised, some further IT systems need modernisation. The transformation of these systems into more generic and standardised ones will optimise cost-effectiveness.

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

- 11. Statistics Finland should continue standardising processes where Information and Communication Technologies solutions or new technologies would increase overall productivity (European statistics Code of Practice, indicators 10.2 and 10.4).**

4.2.2.3 FACING NEW CHALLENGES

The challenge of big data

The widespread use of electronic tools and systems for activities such as communication, location and navigation, registering traffic flows, and purchasing goods, generates huge databases, often referred to as "big data". Generally, such data are privately owned.

These sources have considerable statistical potential. But there are challenges: legal issues, developing partnerships with data owners, using tools to extract and analyse the data.

The Peer Review team was informed that Statistics Finland is closely following developments in this area. An early application could lead to the enhancement of statistics on tourism and on migration, particularly intermittent working migration. An initial legal obstacle would have to be addressed: the Statistics Act, which gives Statistics Finland access to many administrative data sources, cannot be applied to privately owned data such as mobile phone records or customer card data.

Further actions include:

- Exchanging experiences with other NSIs in the use of big data;
- Participating in think tank forums on the issue;
- Identifying potential big data sources and studying tools and methods to access and process them;
- Assessing the cost-effectiveness impact of the use of big data;
- Starting discussions with big data owners, processors and providers.

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

12. **Statistics Finland should promote a project aiming at identifying the statistical potential of new data sources (big data), at promoting the change in the legal framework to allow access, and at upgrading production systems to allow its use (European statistics Code of Practice, Principles 2, 8, 9, 10, 11, and 13).**

Facing the decrease of response-rate

Statistics Finland has implemented many measures and indicators to assess and follow-up the burden on respondents for its various surveys, and to consequently reduce this burden:

- Businesses have electronic tools for reporting;
- As far as methodological requirements allow, Statistics Finland optimises sample designs and selection methods in order to ensure rotation of surveyed units;
- The Survey Laboratory was set up to test and improve survey questionnaires;
- Communication with larger businesses was reinforced to discuss and find common solutions aiming at reducing the reporting burden.

Despite the above mentioned efforts and measures, Statistics Finland records a general drop in the response rates to its major household-based surveys.

Statistics Finland is further developing web-based data collection (i.e. self-declaration) to household-based surveys. A pilot project to test such methodology is underway for the Labour Force Survey and its outcome should be analysed by the end of 2015. Such an approach would alleviate the costs of data collection but may not result in an increase of the response rate.

Statistics Finland is also using automatic data collection in some cases (see example of accommodation data cited above).

Industry representative organisations reported that, when its members were provided with good information on why particular business surveys were carried out and what use is made of the results, the response rates increased. The provision of good information to respondents therefore represents a useful incentive for participating in surveys.

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

13. **To increase response rates, Statistics Finland should improve information and communication regarding the purposes and value of surveys (European statistics Code of Practice, indicator 8.4, Principle 9).**

4.2.3 Further improve quality management and confidentiality and extend it to the whole statistical system

Quality management underpins the strategic objective of producing relevant, accurate and reliable statistics. This chapter focuses on how the already highly performing quality management system of Statistics Finland could be further improved regarding:

- Statistics Finland practices;
- NSS practices;
- Data confidentiality and protection.

4.2.3.1 IMPROVING INTERNAL QUALITY MANAGEMENT PROCEDURES

Statistics Finland has a longstanding commitment to quality, based on quality management, quality assurance, reporting guidelines, policies and tools. The most prominent measure of the Statistics Finland quality management system is its quality auditing system implemented since 2006.

About seven statistics a year are subject to participative internal audits. Audits and reviews begin with a self-evaluation process, based on harmonised questionnaires. In addition, the Standards and Methods department has recently started to carry out yearly cross-cutting audits on the implementation of individual quality handbook practices, and evaluating the level of compliance with quality guidelines. The screening of the quality descriptions of each statistic is done less systematically.

Despite the value of the quality management system, the Peer Review team sees room for improvement from the users' perspective as the audits concentrate on processes and only to a lesser extent on outputs.

A significant strength of Statistics Finland is that it gives functionality to its quality values by implementing tangible quality management tools, such as the operational guidance and planning system STOJ developed in 2001. Quality indicators are part of the bi-annual performance reports produced at Department level on the basis of the STOJ system. The Peer Review team feels that the system could benefit from further developments, such as the dynamic production of various reports, or the publication of quality indicators at product level. Quality indicators are further integrated in financial reports at institution level.

STOJ is also used to define the calendar of statistical releases and to follow up the timeliness compliance of the releases with the initial calendar. As the system is updated daily with this information, users receive almost instantaneous information when delays occur. However, Statistics Finland does not keep the initial calendar available to users. The Peer Review team considers it would be advisable to allow users to assess the timeliness indicator by keeping track of the various changes in the initial calendar release.

Statistics Finland produces a biannual performance report for the Ministry for Finance covering the activities set out in the statistical programme. This report mainly concerns the financial performance (efficiency) and the use of human resources and does not focus on data quality (relevance, accuracy, interpretability, timeliness, coherence, accessibility).

The standard quality reports and methodology reports are areas where improvements could be achieved. The readability of some quality reports could be improved, further methodological information should be provided, such as editing and imputations procedures, and these reports should also be available in English on the website.

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

- 14. Statistics Finland should reinforce users' perspective in its quality audits (European statistics Code of Practice, indicators 6.1, 6.2, 6.3, and 6.4).**
- 15. Statistics Finland should upgrade accessibility, completeness and readability of its quality reports (European statistics Code of Practice, indicators 15.1, 15.5, and 15.6).**
- 16. Statistics Finland should include quality criteria in the measurement of its performance (European statistics Code of Practice, indicator 15.7).**

4.2.3.2 EXTENDING QUALITY MANAGEMENT PRACTICES TO THE NATIONAL STATISTICAL SYSTEM

As the main coordinator of official statistics, Statistics Finland is sharing its auditing practices with other stakeholders. As additional initiative, all Finnish producers of official statistics completed the light self-assessment questionnaire for further quality improvement purposes. In the view of the Peer Review team, introducing the idea of co-participative quality audit involving staff from other institutions in the evaluation teams performing the audit exercises would enhance the value of the recommendations and enrich assessments with broader perspective.

Training about quality is essential to ensure continuous improvement and commitment of all the persons involved in the production and dissemination process. Quality is indeed part of the basic training Statistics Finland organises twice a year for its new staff and also in the advanced training carried out in every other year, and specific more advanced training on total quality management is available to Statistics Finland managers.

While the Statistics Finland focus on quality measurements is appreciable, better instructions and proper training on how to measure quality indicators and how to report on them should be provided for statisticians of the whole NSS. The fulfilment of the requirements should also be further monitored. It could also be advisable to structure methodological descriptions and share all these standardised measurements and reporting templates with all the producers of official statistics.

Similarly, promoting the Generic Statistical Business Process Model (GSBPM) adopted by Statistics Finland in 2009 would enhance quality management principles and standardise terminology to aid stakeholders of the NSS discussing the processes and metadata systems. The Information Centre of the Ministry of Agriculture and Forestry already decided to implement this model when merging with other institutions within the future Natural Resources Institute of Finland.

If extended to other producers of the NSS, the model could be used as a common framework for reviewing several statistical programmes for their quality assurance practices. From the perspective of the user, the use of a uniform model would be highly beneficial to the readability of quality indicators.

Statistics Finland already follows Statistical Data and Metadata Exchange (SDMX) standards for the transmission of census and national accounts data and metadata to Eurostat. Finnish Customs also uses SDMX standards and guidelines. It would be beneficial to promote the use of SDMX to Other National Authorities.

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

- 17. Statistics Finland should develop training on quality management, quality assurance and quality reporting for other producers of official statistics in the National Statistical System, and in particular their new staff (European statistics Code of Practice, Principle 4).**
- 18. Statistics Finland should promote the practice of systematic quality audits by Other National Authorities, and foster the participation of external reviewers in the auditing process (European statistics Code of Practice, Principle 4).**

4.2.3.3 REVIEW CONFIDENTIALITY AND DATA PROTECTION MEASURES

Statistics Finland takes data security and confidentiality very seriously. Many security functions have been audited by external auditors in recent years, largely concentrating on the IT and technical aspects of security. In addition, Statistics Finland's internal auditor will be auditing compliance with disclosure control rules during 2014.

The Peer Review team discussed with Statistics Finland the use of personal identifiers in statistical registers and datasets. It is Statistics Finland's practice to increase the protection of personal data by replacing personal identification numbers in their Population Data Warehouse system by unique surrogate codes. However, for statistical reasons, Statistics Finland cannot completely give up the usage of personal identifiers. The Peer Review team accepts this, but believes it is important to minimise this type of processing.

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

19. **Statistics Finland should ensure that, when processing or combining personal data, surrogate codes rather than actual personal identifiers are used to the greatest possible extent (European statistics Code of Practice, indicator 5.5).**

4.2.4 *Improve dissemination and the prominence of official statistics*

Statistics Finland has developed an efficient output system and metadata-driven website. This chapter focuses on how official statistics and its output could be enhanced through:

- Improving statistical releases;
- Improving the website;
- Increasing the prominence of official statistics.

4.2.4.1 ENHANCE THE CLARITY AND ATTRACTIVENESS OF STATISTICAL RELEASES

A key component of dissemination is the statistical release. A well-written release, in clear and simple language, will attract attention, inform users effectively, and be communicated more widely. However, while Statistics Finland's releases are undoubtedly factual and objective, the Peer Review team were informed by some users that Statistics Finland's releases tended to be dense and difficult to digest. The text for some releases is formulaic, following the same pattern from one period to the next with just the numbers changing.

In order to improve the accessibility and clarity of releases, statisticians should take the time to examine the data structurally and over time, and find the best way of bringing the numbers to life by telling the story in an interesting and newsworthy way.

As far as the Peer Review team could determine, Statistics Finland's statistics get generally good coverage in the media, but there seems to be some room for improvement. There is not as much contact between Statistics Finland and the media as might be expected, press conferences are quite rare, and there is a tendency to avoid controversy.

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

20. **An editorial function (a dedicated editor with the required skills, or an editorial board) should be established to examine releases critically and to provide feedback and follow-through to authors (European statistics Code of Practice, Principle 15).**

4.2.4.2 WEBSITE IMPROVEMENTS

Statistics Finland's website is a good example of an efficient metadata-driven website. It is simple, uncluttered, and navigation is generally easy. However, it is designed for larger screens and does not provide a good viewing experience on small mobile screens where reading and navigation requires resizing, panning, and scrolling.

In its StatFin service, Statistics Finland makes good use of PX-Web as a front-end to PC-Axis files, the software developed by Statistics Sweden to allow the user to create dynamic tables. In contrast to the Statistics Finland main Statistics page, which links to all official statistics, the StatFin tables contain (with a few minor exceptions) only statistics produced by Statistics Finland. The other statistics producers disseminate their statistics on their own websites, some using PX-Web, some by other means. Accessibility and coordination would be improved if all producers used the same format, and if all the tables were held in StatFin, or at least accessible in a similar format from the StatFin page.

The StatFin pages that contain lists of tables can take time for the users to grasp. The long table titles and other table details are automatically generated by the software, and the sort order may not be clear. The user experience would be improved if, for pages that contain many tables, some visual means could be used to distinguish the tables (e.g. by highlighting the key tables) so that the users could more easily and quickly locate the table they want.

The Peer Review team heard evidence that specialist users find it difficult to create systems that automatically retrieve the information they want from Statistics Finland's tables. This is presumably possible by using the open data API (application programming interface) facility to retrieve data from the StatFin PC-Axis files, and this facility should be supported and publicised for such users.

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

- 21. Statistics Finland should further improve the accessibility of its website, using responsive web design adapted to various sizes of screens, developing a mobile version, and providing a more user-friendly access to the tables (European statistics Code of Practice, indicator 15.2).**

4.2.4.3 INCREASE THE PROMINENCE OF OFFICIAL STATISTICS

In Finland, statistics are identified as official by a conformity label, or quality mark, currently assigned by the Advisory Board for Official Statistics. There are about 300 of such statistics, of which about 200 are produced by Statistics Finland, and can be accessed via a particular page on the Statistics Finland website. This page is informally referred to as the Portal for Official Statistics.

The quality label is a useful indication that the labelled statistics are relevant and comply with quality standards. Some users informed the Peer Review team that they were aware of the logo and considered it a useful indicator of quality. The Peer Review team feels that its use could usefully be extended to data collection and not just dissemination, particularly for household surveys where response rates are falling.

The page referred to as the Portal for Official Statistics is reached from a link "Official Statistics of Finland" on the bottom of Statistics Finland home page. Therefore it is not clear that it covers all official statistics in Finland. Moreover, it is not called a portal on the website and it is not branded as such. The Peer Review team feels that coordination of official statistics would be improved and that the quality rating would get greater prominence if there was a clearly identified portal with a higher profile, either on the Statistics Finland website or on a separate website.

Each of the producers of official statistics in Finland maintains their own public release calendar for their own statistics. There is no overall release calendar for all official statistics. The Peer Review team's view is that there should be a single common release calendar, maintained by Statistics Finland and integrated with the portal.

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

22. The quality marks to identify official statistics should be extended to data collection operations, for example by inserting the logo on questionnaires and information documents (European statistics Code of Practice, Principle 4, indicators 11.1 and 15.7).
23. Statistics Finland should set up a well-branded web portal to all official statistics, including a single calendar covering all of Finland's official statistics (European statistics Code of Practice, Principles 11 and 15).

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

Divergent views to recommendations 1 and 19:

- 1. The Statistics Act should be amended to establish a Statistical Council, with external users' representation (European statistics Code of Practice, Principles 9 and 11).**

As the Peer Review team notes a number of expert and other cooperation groups exist between Statistics Finland and various stakeholders. The cooperation is versatile: it takes place at different levels of statistics production starting from planning stage and ending in user opinions on statistics and their contents. Thus the cooperation groups deal with the questions put forward as tasks for the Statistical Council. The Information Services Department will consider various ways to improve obtaining the user opinions. (see reply to recommendation 2).

The proposal of establishing the statistical council anew has already been discussed both with the Ministry of Finance and the Advisory Board of Statistics Finland. It appeared that the reasons to replace the council by domain-specific cooperation and expert groups are still valid. However, it might be possible to enlarge the Advisory Board of Statistics Finland by inviting new expert members who represent various users of statistics.

- 19. Statistics Finland should ensure that, when processing or combining personal data, surrogate codes rather than actual personal identifiers are used to the greatest possible extent (European statistics Code of Practice, indicator 5.5).**

Statistics Finland agrees with the peers of the high importance of data security and confidentiality. The proposal is actually by and large the current modus operandi.

Statistics Finland has reduced the use of personal identification numbers (PIN) in ordinary statistics production. The databases contain the true PINs only when it is necessary in order to combine the data sets with other sources. Even though we can often use surrogate codes instead of the PINs in statistics production, the research data sets require even stronger case-specific codes which cannot be matched with the original data. The options to use such surrogate codes are being currently studied.

Statistics Finland maintains the keys for all the codes for eventual additional operations with the data sets. Thus, giving up the maintenance of PINs is not an option.

ANNEX A: PROGRAMME OF THE VISIT

| Time | Programme | Organisation | Participants |
|---------------------------------------|---|--------------|---|
| Day 1 – Monday 25 August 2014 | | | |
| From-To | Subject | | Name- Persons in bold are the official participants, other persons are observers. |
| 09.00 – 10.30 | 1 Peer Review team discussion to finalise the preparation of the visit. | | Peer Review team |
| 10.30 – 10.45 | Coffee break | | |
| 10.45 – 12.00 | 2 Preparatory meeting with the NSI coordinator team and, possibly, other national participants in the visit to discuss practical aspects of the visit. | | NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Tuula Hausmann, Mr Ville Koskinen, Ms Sirkku Mertanen, Ms Johanna Rantanen, Mr Ari Tyrkkö Management: Mr Timo Koskimäki, Ms Heli Mikkela, |
| 12.00 – 12.30 | 3 Welcome and introduction of programme, organisational matters | | Management: Ms Marjo Bruun, Mr Jarmo Hyrkkö, Mr Pasi Henriksson, Ms Riitta Eiskonen, Mr Jari Tarkoma, Mr Timo Koskimäki, Ms Riitta Harala, Ms Leena Storgårds, Ms Hannele Orjala, Ms Heli Mikkela Observers: NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Sirkku Mertanen, Ms Johanna Rantanen |
| 12.30 – 13.20 | 4 General information session with a description on how the national statistical system is organised (bodies, distribution of responsibilities, relations between authorities). | | Management: Ms Marjo Bruun, Mr Jarmo Hyrkkö, Mr Pasi Henriksson, Ms Riitta Eiskonen, Mr Jari Tarkoma, Mr Timo Koskimäki, Ms Riitta Harala Observers: NSI coordinator team 'COPAR': Mr Ari Tyrkkö, Mr Kari Djerf, Ms Sirkku Mertanen, Ms Johanna Rantanen |
| 13.20 – 14.15 | Lunch | | |
| 14.15 – 15.15 | 5 Coordination role of the NSI | | Mr Ari Tyrkkö, Ms Tuula Hausmann Management: Mr Timo Koskimäki, Ms Riitta Harala, Ms Heli Mikkela, Observers: Ms Anita Heinonen, NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Sirkku Mertanen, Ms Johanna Rantanen |
| 15.15 – 15.30 | Coffee break | | |
| 15.30 – 17.00 | 6 The statistical law and related legislation (CoP principles 1, 2, 5 and 6) | | Ms Johanna Rantanen, Ms Marja Tammilehto-Luode, Ms Sari Kuisma, Ms Tuula Viitaharju, Ms Mari Ylä-Jarkko, Observers: Management: Mr Jarmo Hyrkkö, Mr Jari Tarkoma, Ms Heli Mikkela, Mr Timo Koskimäki, Ms Hannele Orjala NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| Day 2 – Tuesday 26 August 2014 | | | |

| Time | | Programme | Organisation | Participants |
|--|------|---|--------------|---|
| 09.15 11.00 | - 7 | Programming, planning and resources, including training (CoP principles 3, 9 and 10) | | Ms Marja Sjöblom, Ms Päivi Högnäsbacka-Hietanen, Ms Riikka Mäkinen, Mr Jukka Oikarinen, Mr Henrik Hietanen, Mr Matti Okko, Ms Irja Blomqvist, Mr Sami Saarikivi, Observers: Management: Ms Marjo Bruun, Mr Jarmo Hyrkkö, Mr Pasi Henriksson, Ms Riitta Eiskonen, Mr Timo Koskimäki NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| 11.00 11.15 | - | Coffee break | | |
| 11.15 12.15 | - 8 | Cooperation / level of integration of the ESS | | Mr Ari Tyrkkö, Ms Tuula Hausmann Management: Ms Marjo Bruun, Mr Timo Koskimäki Observers: Ms Marika Pohjola NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| 12.15 13.15 | - | Lunch | | |
| 13.15 14.45 | - 9 | Meeting with main users – Ministries and other public/private institutions (including Central Bank as a user) | | Mr Mika Kuismanen, Mr Petri Syvänen, Mr Matti Kyrö, Mr Pirkka Jalasjoki, Mr Olli Kärkkäinen, Mr Kari Oinonen, Mr Ari Pajuniemi, Mr Juha Suokas Observers: Management: Mr Jarmo Hyrkkö, Mr Timo Koskimäki, Ms Heli Mikkellä NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Sirkku Mertanen, Mr Ari Tyrkkö |
| 14.45 15.00 | - | Coffee break | | Extempore presentation of the Advisory Board of Statistics Finland by Ms Marja Sjöblom |
| 15.00 16.00 | - 10 | Meeting with main users – Media | | Ms Anne Kaikkonen, Ms Kati Pohjanpalo, Ms Pirjo Valpas Observers: Ms Mervi Ukkonen Management: Ms Heli Mikkellä, Mr Timo Koskimäki, Ms Riitta Harala NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| 16.00 17.00 | - 11 | Meeting with main users – Scientific community | | <u>Universities:</u> Mr Kimmo Vehkalahti, Mr Reijo Sund, Mr Antti Ripatti, Mr Mika Haapanen, <u>Research Institutes:</u> Mr Kari Hämäläinen, Mr Jouni Välijärvi, Mr Antero Malin, Ms Mari Kleemola, Ms Mari Kangasniemi Observers: Marianne Johnson Management: Mr Timo Koskimäki, Ms Heli Mikkellä, NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Sirkku Mertanen, Ms Johanna Rantanen |
| Day 3– Wednesday 27 August 2014 | | | | |
| 09.00 10.30 | - 12 | Quality (organisational structure, tools, monitoring, ...) (CoP principles 4 and 11 to 15) | | Mr Kari Djerf, Mr Ville Koskinen, Ms Anne Kirjavainen, Ms Kirsti Pohjanpää, Mr Pekka Tamminen, Mr Markku Huttunen Management: Ms Marjo Bruun, Mr Timo Koskimäki, Ms Hannele Orjala, Ms |

| Time | Programme | Organisation | Participants |
|---------------------------------------|-----------|---|--|
| | | | Heli Mikkela Observers: Ms Mari Ylä-Jarkko NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| 10.30 10.45 | – | Coffee break | |
| 10.45 11.45 | – 13 | Implementation of Quality management: concrete example and discussion Example: CPI quality management (presented by Ms Mari Ylä-Jarkko) | Ms Mari Ylä-Jarkko Management: Ms Marjo Bruun, Mr Timo Koskimäki NSI coordinator team 'COPAR': Mr Kari Djerf, Mr Ville Koskinen Observers: NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| 11.45 13.15 | – 14 | Dissemination, including user's consultation (CoP principles 6, 11 and 15) | Mr Harri Lehtinen, Ms Anne Kirjavainen, Mr Juha-Pekka Konttinen, Mr Markku Huttunen, Ms Mervi Ukkonen, Mr Ville Koskinen, Mr Ville Tolkki Observers: Management: Mr Timo Koskimäki, Ms Riitta Harala, Ms Heli Mikkela NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| 13.15 14.00 | – | Lunch | Extempore presentation of the ERP-system 'STOJ' by Ms Päivi Högnäsbacka-Hietanen |
| 14.00 15.00 | – 15 | Methodology, data collection, data processing and administrative data (CoP principles 2, 7 and 8) | Mr Jukka Pakola, Mr Jari Nieminen, Mr Juha Honkkila, Ms Johanna Leivo, Mr Kari Djerf, Mr Faiz Alsu hail, Ms Anne Väänänen, Mr Juha-Pekka Konttinen, Mr Harri Lehtinen Observers: Management: Mr Jari Tarkoma, Mr Timo Koskimäki NSI coordinator team 'COPAR': Mr Ville Koskinen, Ms Sirkku Mertanen |
| 15.00 15.30 | – | Coffee break | Extempore presentation of the Survey Laboratory by Mr Petri Godenhjelm |
| 15.30 17.00 | – 16 | Methodology, data collection, data processing and administrative data (CoP principles 2, 7 and 8) (Cont'd) | (Cont'd) |
| Day 4– Thursday 28 August 2014 | | | |
| 09.00 10.30 | – 17 | Meeting with the Finnish Customs | Mr Olli-Pekka Penttilä, Ms Christina Telasuo Observers: Ms Tuula Kyyrä Management: Mr Timo Koskimäki NSI coordinator team 'COPAR': Ms Sirkku Mertanen, Mr Ari Tyrkkö |
| 10.30 10.45 | – | Coffee break | |
| 10.45 11.45 | – 18 | Meeting with Junior staff | Mr Juha Korpela, Mr Tuukka Saranpää, Ms Laura Haverinen, Mr Topias Pyykkönen, Ms Hanna Heljala, Ms Lea Vuorinen, Mr Sami Meri |

| Time | | Programme | Organisation | Participants |
|-------------------------------------|------|---|--------------|--|
| 11.45 12.30 | – 19 | Confidentiality principles 5) | (CoP | Ms Annu Nissinen, Ms Janika Tarkoma, Ms Reetta Moilanen, Ms Marja Tammilehto-Luode, Mr Ville Tolkki, Ms Johanna Rantanen, Mr Veli-Matti Jantunen, Mr Harri Koskinen Observers: Management: Ms Marjo Bruun, Mr Jarmo Hyrkkö, Mr Timo Koskimäki, Ms Heli Mikkilä NSI coordinator team 'COPAR': Ms Sirkku Mertanen |
| 12.30 13.30 | – | Lunch | | |
| 13.30 15.00 | – 20 | Meeting with the Information Centre of the Ministry of Agriculture and Forestry, Tike | | Mr Esa Katajamäki, Ms Anna Louhivaara Observers: Ms Anna Heino, Ms Hannele Tanhua, Ms Tuula Kyyrä, Mr Vesa Ylönen NSI coordinator team 'COPAR': Ms Sirkku Mertanen, Mr Ari Tyrkkö |
| 15.00 15.15 | – | Coffee break | | |
| 15.15 17.00 | – 21 | Meeting with main data providers/respondents | | Mr Seppo Saukkonen, Mr Matti Luokkanen, Ms Ulla-Maija Heikkilä, Ms Päivi Pösö, Ms Anu Nemlander Observers: Ms Merja Seppä-Heikka Management: Mr Jari Tarkoma, Mr Timo Koskimäki, Ms Hannele Orjala NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Sirkku Mertanen, Mr Ari Tyrkkö |
| Day 5– Friday 29 August 2014 | | | | |
| 09.00 10.30 | – 22 | Peer Review team discussion | | Peer Review team |
| 10.30 11.00 | – | Coffee break | | incl. discussion with DG of Statistics Finland Marjo Bruun |
| 11.00 12.00 | – 22 | Peer Review team discussion (Cont'd) | | Peer Review team |
| 12.00 12.30 | – 23 | Clarifications, remaining or additional issues and focus areas | | Peer Review team + NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Tuula Hausmann, Mr Ville Koskinen, Ms Sirkku Mertanen, Ms Johanna Rantanen, Mr Ari Tyrkkö |
| 12.30 13.30 | – | Lunch | | |
| 13.30 15.30 | – 24 | Meeting with senior management: conclusions and recommendations | | Management (excl.DG): Mr Jarmo Hyrkkö, Mr Pasi Henriksson, Ms Riitta Eiskonen, Mr Jari Tarkoma, Mr Timo Koskimäki, Ms Riitta Harala, Ms Leena Storgårds, Ms Hannele Orjala, Ms Heli Mikkilä Observers: NSI coordinator team 'COPAR': Mr Kari Djerf, Ms Sirkku Mertanen, Ms Johanna Rantanen |

ANNEX B. LIST OF PARTICIPANTS

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| | Peer reviewers |
| 1 | Mr Jean-Michel Durr, France (chair) |
| 2 | Ms Isabelle de Pourbaix, Belgium |
| 3 | Mr Adrian Redmond, Ireland |
| | Observer |
| 1 | Ms Claudia Junker, Eurostat, Head of the Statistical Cooperation Unit. |
| | Participants from Statistics Finland |
| | Management of Statistics Finland: |
| 1 | Ms Marjo Bruun, Director General |
| 2 | Mr Jarmo Hyrkkö, Deputy Director General, Office of Director General |
| 3 | Mr Timo Koskimäki, Deputy Director General of Statistics Production, Standards and Methods |
| 4 | Mr Pasi Henriksson, Director, Administration |
| 5 | Ms Riitta Eiskonen, Director, Information technology |
| 6 | Mr Jari Tarkoma, Director, Data Collection |
| 7 | Ms Riitta Harala, Director, Population and Social Statistics |
| 8 | Ms Leena Storgårds, Director, Economic and Environmental Statistics |
| 9 | Ms Hannele Orjala, Director, Business Statistics |
| 10 | Ms Heli Mikkilä, Director, Communication and Information Services |
| | Peer review coordinator team 'COPAR' of Statistics Finland: |
| 11 | Mr Kari Djerf, Senior Adviser, Standards and Methods, Statistical Methods |
| 12 | Ms Tuula Hausmann, Senior Adviser, Office of Director General, Co-ordination and International Activities |
| 13 | Mr Ville Koskinen, Senior Adviser, Standards and Methods, Support |
| 14 | Ms Sirkku Mertanen, Senior Adviser, Standards and Methods, Management |
| 15 | Ms Johanna Rantanen, Senior Adviser, Administration, Personnel and Legal Services |
| 16 | Mr Ari Tyrkkö, Head, Office of Director General, Co-ordination and International Activities |
| | Other participants of Statistics Finland: |
| 17 | Ms Marja Tammilehto-Luode, Senior Adviser, Population and Social Statistics |
| 18 | Ms Sari Kuisma, Head of Statistics, Data Collection, Business data, Support |
| 19 | Ms Tuula Viitaharju, Senior Adviser, Business Statistics, co-ordination |
| 20 | Ms Mari Ylä-Jarkko, Head of Statistics, Economic and Environmental Statistics, Support |
| 21 | Ms Marja Sjöblom, Senior Adviser, Office of Director General |
| 22 | Ms Päivi Högnäsbacka-Hietanen, Financial Planning Officer, Administration, Financial Administration Services |

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| 23 | Ms Riikka Mäkinen, Head, Customer Training, Administration, Personnel and Legal Services |
| 24 | Mr Jukka Oikarinen, Senior Adviser, Data Collection, Management |
| 25 | Mr Henrik Hietanen, Manager, IT Development, Information Technology, Alignment Services |
| 26 | Mr Matti Okko, Head of Statistics, Economic and Environmental Statistics, Government and Sector Accounts |
| 27 | Ms Irja Blomqvist, Senior Adviser, Population and Social Statistics |
| 28 | Mr Sami Saarikivi, Senior Adviser, Business Statistics, Support |
| 29 | Ms Anne Kirjavainen, Head of Statistics, Population and Social Statistics, Working Life |
| 30 | Ms Kirsti Pohjanpää, Head of Statistics, Data Collection, Co-ordination, Development and SurveyLab |
| 31 | Mr Pekka Tamminen, Senior Statistician, Economic and Environmental Statistics, Government Finance and |
| 32 | Mr Markku Huttunen, Head, Communication and Information Services, Information Services Management |
| 33 | Mr Harri Lehtinen, Manager, IT Development, Information Technology, Interface Application Services |
| 34 | Mr Juha-Pekka Konttinen, Head of Statistics, Business Statistics, Innovations, Transport and Tourism |
| 35 | Ms Mervi Ukkonen, Chief Communication Officer, Communication and Information Services, Communication |
| 36 | Mr Ville Tolkki, Head of Statistics, Economic and Environmental Statistics, National Accounts |
| 37 | Mr Jukka Pakola, Head of Statistics, Data Collection, Business and Environment |
| 38 | Mr Jari Nieminen, Senior Adviser, Population and Social Statistics |
| 39 | Mr Juha Honkkila, Head of Statistics, Population and Social Statistics, Income and Living Conditions |
| 40 | Ms Johanna Leivo, Head of Statistics, Economic and Environmental Statistics, Data Collections |
| 41 | Mr Faiz Alshail, Head of Research, Standards and Methods, Statistical Methods |
| 42 | Ms Anne Väänänen, Senior Statistician, Standards and methods, Metadata Services |
| 43 | Ms Annu Nissinen, Senior Statistician, Standards and Methods, Statistical Methods |
| 44 | Ms Janika Tarkoma, Senior Statistician, Standards and Methods, Statistical Methods |
| 45 | Ms Reetta Moilanen, Head of Statistics, Business Statistics, Monthly Business Indicators |
| 46 | Mr Veli-Matti Jantunen, Planning Officer, Communication and Information Services, Basic distribution and |
| 47 | Mr Harri Koskinen, Head of Data Security, Office of Director General |
| | Observers/Presenters (if not mentioned in other contexts): |
| 48 | Ms Marika Pohjola, Planning Officer, Office of Director General, Co-ordination and International Activities |
| 49 | Ms Merja Seppä-Heikka, Senior Statistician, Standards and Methods, Research services |
| 50 | Ms Marianne Johnson, Senior Statistician, Standards and Methods, Research services |
| 51 | Mr Petri Godenhjelm, Senior Statistician, Data Collection/Cognitive Laboratory |
| | Junior staff of Statistics Finland: |
| 52 | Mr Juha Korpela, Project Manager, Business Statistics, Support |
| 53 | Mr Tuukka Saranpää, Senior Statistician, Standards and Methods, Research Services |
| 54 | Ms Laura Haverinen, Planning Officer, Communication and Information Services, Basic Distribution and |

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| 55 | Mr Topias Pyykkönen, Senior Statistician, Population and Social Statistics, Statistics on Employment and |
| 56 | Ms Hanna Heljala, Senior Statistician, Data Collection, Business Data, support |
| 57 | Ms Lea Vuorinen, Senior Statistician, Economic and Environmental Statistics, Support |
| 58 | Mr Sami Meri, Software Architect , Information Technology |
| | Participants from other organisations |
| | Main users, data providers/respondents: |
| 1 | Mr Mika Kuismanen, Director, The Ministry of Finance, Economics Department/Forecasting Unit |
| 2 | Mr Petri Syvänen, Ministerial adviser, Ministry of Employment and the Economy, Knowledge Management |
| 3 | Mr Matti Kyrö, Counsellor of Education, Finnish National Board of Education, Statistics and international affairs |
| 4 | Mr Pirkka Jalasjoki, Information Specialist, Bank of Finland, Monetary Policy and Research Department |
| 5 | Mr Olli Kärkkäinen, Researcher, The Finnish Parliament, Research Service |
| 6 | Mr Kari Oinonen, Head of Unit, Finnish Environment Institute, Environmental Policy Centre, Land Use |
| 7 | Mr Ari Pajuniemi, Senior Planning Officer , Ministry of Justice, Department of Judicial Administration, Court |
| 8 | Mr Juha Suokas, Senior Statistician, City of Helsinki, Urban Facts, Statistics on Enterprises and Employment |
| 9 | Ms Anne Kaikkonen, Managing Editor, Finnish Broadcasting Company, Yle News |
| 10 | Ms Kati Pohjanpalo, Helsinki Bureau Chief, Bloomberg News |
| 11 | Ms Pirjo Valpas, Director, Production & Design, Talentum Media Oy |
| 12 | Mr Kimmo Vehkalahti, Docent of Applied Statistics, University of Helsinki |
| 13 | Mr Reijo Sund, Docent, University of Helsinki, Faculty of Social Sciences |
| 14 | Mr Antti Ripatti, Professor, University of Helsinki, Faculty of Social Sciences |
| 15 | Mr Mika Haapanen, Senior researcher, University of Jyväskylä, School of Business and Economics (JSBE) |
| 16 | Mr Kari Hämäläinen, Principal economists, VATT (Government Institute for Economic research), Labour market |
| 17 | Mr Jouni Välijärvi, Professor, Director of the Finnish Institute for Educational Research, University of Jyväskylä |
| 18 | Mr Antero Malin, Professor, Head of the methodological unit, Finnish Institute for Educational Research, |
| 19 | Ms Mari Kleemola, Information Services Manager, Finnish Social Science Data Archive |
| 20 | Ms Mari Kangasniemi, Senior researcher, Labour Institute for Economic Research |
| 21 | Mr Seppo Saukkonen, Senior Adviser, Confederation of Finnish Industries, Labour Market and Industrial |
| 22 | Mr Matti Luokkanen, Senior Adviser, Tax Administration, Tax Collection Unit |
| 23 | Ms Ulla-Maija Heikkilä, Head of Information Service, Tax Administration, Executive and Legal Unit |
| 24 | Ms Päivi Pösö, Information Services Manager, Population Register Center, Corporate Customers |
| 25 | Ms Anu Nemlander, Head of the team for information and finance, The Association of Finnish Local and |
| | Participants of ONAs: |
| 26 | Mr. Olli-Pekka Penttilä, Director of Statistics, Finnish Customs |
| 27 | Ms. Christina Telasuo, Head of Publications and Statistical Services group, Finnish Customs |

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| 28 | Mr Esa Katajamäki, Head of Statistics Division, Information Centre of the Ministry of agriculture and Forestry, |
| 29 | Ms Anna Louhivaara, Production Manager, Information Centre of the Ministry of agriculture and Forestry, |
| | Observers: |
| 30 | Ms Tuula Kyyrä, Finnish Centre for Pensions |
| 31 | Ms Anna Heino, National Institute for Health and Welfare (THL) |
| 32 | Ms Hannele Tanhua, National Institute for Health and Welfare (THL) |
| 33 | Mr Vesa Ylönen, Social Insurance Institution of Finland |