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## **Peer review on the implementation of the European Statistics Code of Practice**

**Country visited:** Finland

**Date:** 8 – 10 August 2007

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## 1. EXECUTIVE SUMMARY

### **Main findings:**

Official Statistics of Finland (OSF) is a centralized system. Overall, there are three categories of producers of Official Statistics: 4 "Statistical Authorities" (Statistics Finland plus 3 other specialist statistical institutes), 13 "Other Authorities Producing Statistics" and 3 "Other Producers of Statistics" (including the Bank of Finland).

Statistics Finland (SF) is the major producer within the OSF. It is an independent government agency subordinated in the administrative branch of the Ministry of Finance. SF has only four small regional offices (2-5 employees) for dissemination of statistical information. It is a well-known organisation within the Finnish adult population since 86% are aware of its existence and tasks.

The Statistics Act has major relevance for the OSF. It covers the first two categories of statistics producers. It contains regulations concerning the collection and processing of data. The "Statistical Authorities" have a mandate for data collection for statistical purposes. Furthermore, the obligation to supply data is covered. Besides the Statistics Act, the Decree on Statistics Finland, the Personal Data Act, the Act on the Openness of Government Activities and the Act on the Charge Criteria of the State are important acts for statistics production. The mandate for the other producers is defined in their respective terms of reference.

Statistics Finland represents the OSF as a whole and has the coordinating role. Statistics Finland also chairs the Advisory Board of OSF that was established in October 2002. The Board should promote the unity of OSF, make recommendations and issue guidelines concerning the quality of the statistics, support comprehensive Internet services and the increase of recognition of the statistical services in the public. The ambition of OSF is to fulfil and combine domestic and European/international needs preserving methodological independence (subsidiary principle). Especially, Statistics Finland has the vision of being a top organization in its field, recognized nationally and internationally for its high-quality data production and expertise, and for its co-operative and service capacity.

Statistics Finland complies fully with the majority of the reviewed indicators in Principles 1-6 and 15. In all other cases it is 'largely' compliant.

The main findings of the review are as follows:

- The independence of Statistics in Finland is not under question;
- The mandate for the collection of data is clearly set out in legislation;
- Statistics Finland is well served in respect of financial, IT and human resources;
- Quality is deemed of the utmost importance by SF management and is an intrinsic part of all operations;
- Statistical confidentiality is guaranteed by law and breaches are unknown;
- All users have equal access to statistical information;
- There is no doubt concerning the impartiality and objectivity of SF's operations;
- The Code of Practice is widely observed in the whole statistical system.

## 2. INTRODUCTION

With the adoption of the European Statistics Code of Practice, the Statistical Programme Committee (SPC) committed itself to adhering to its principles. At its meeting on 25 May 2005, the SPC endorsed a stepwise monitoring procedure for the implementation of the Code over three years during which countries' self-assessments should be combined with elements of peer review, benchmarking and monitoring on the basis of the explanatory indicators added to each principle of the Code.

During December 2005 / January 2006 the National Statistical Institutes and Eurostat have completed their self-assessments, the results have been summarised by Eurostat in a report submitted to the Economic and Financial Committee in May 2006 which has been published on the Eurostat website.

As a next step towards implementation of the Code, the European Statistical System is organising peer reviews to complement the self-assessments starting with 2006. They are considered a vital element for the implementation of the Code of Practice given their capacity to encourage the sharing of best practice and to contribute to transparency in what is, essentially, a self-regulatory approach. This approach is designed to enhance accountability and to help in building trust in the integrity of the European Statistical System, its processes and outputs.

The Code of Practice peer reviews follow a common methodology focusing on the institutional environment and dissemination part of the Code comprising the following principles: (1) Professional independence, (2) Mandate for data collection, (3) Adequacy of resources, (4) Quality commitment, (5) Statistical confidentiality, (6) Impartiality and Objectivity and (15) Accessibility and Clarity. While an assessment is included in this peer review report, it should be noted that it could not draw on a fully developed common methodology but has rather been based on the Code of Practice self-assessment questionnaire and the peers' experience and background in this area. In principle, the peer review is limited to the National Statistical Institute and its co-ordination role within a dispersed national statistical system. A short document provided by the National Statistical Institute which summarises key aspects of the functioning of the national statistical system is published together with this report.

During a three days visit on-site and on the basis of information material provided by the National Statistical Institute and Eurostat prior to the review, peer reviews produce a report assessing compliance with the Code of Practice at indicator level and in principle following a four point assessment scale. The report includes a refined set of improvement actions covering all principles of the Code which are being used to feed the monitoring process of the implementation of the Code in the European Statistical System.

While the peer reviewers will undertake to base their assessment to the extent possible on factual information, it is worth noting some of the limitations of the peer review process. For example, peer reviewers are dependent upon the resources made available to them (though experienced reviewers can be expected to identify where appropriate information is not forthcoming). In addition these reviews are conducted on a strategic, organisation-wide and system wide basis. Accordingly it is not straightforward to ascertain that certain practices or behaviours or systems operate in all statistical domains.

### 3. FINDINGS PER PRINCIPLE

#### Principle 1: Professional Independence

*The professional independence of statistical authorities from other policy, regulatory or administrative departments and bodies, as well as from private sector operators, ensures the credibility of European Statistics.*

Overall assessment: Statistics Finland is a central office within the government department under the Ministry of Finance (Statistics Finland Act 1992/48, Sec 1). The tasks of Statistics Finland are laid down in the Statistics Finland Act.

The Director General is appointed through the Council of State without temporal limitation. The Director General has the duty to manage the activities and finances of Statistics Finland (Council of State Decree on Statistics Finland, No. 1063/2002, Sec. 5) based on an annual agreement with the Ministry of Finance defining targets for the next year (management by objectives and results) and midterm budgeting plans. The Director General appoints the directors of the operating units. The Ministry of Finance appoints a deputy for the Director General at submission of the Director General.

The strategic management of SF is supported through the Advisory Board of Statistics Finland (No. 1063, Council of State Decree on Statistics Finland 2002, Sec. 3). The board consists of the Director General of SF and no more than seven other members. The staff of SF elects one of the members among themselves. The other members are nominated by Ministry of Finance for no more than four years.

There is a strong underlying culture of independence for statistics in Finland that is respected by all players.

*Indicator 1.1: The independence of the statistical authority from political and other external interference in producing and disseminating official statistics is specified in law.*

Assessment: Largely met

Comments: Statistics Finland has professional independence although it is not explicitly mentioned in national legislation. Sec. 1 of the Statistics Act (280/2004) refers explicitly to the EU Statistics Act (322/1997) by saying "Council Regulation (EC) No 322/97 shall be applied to the statistics included in the statistical programme of the European Community". Moreover, sec. 7 (Statistics Act) gives to Statistics Finland full independence to decide on its data collection<sup>1</sup> and sec. 13 gives Statistics Finland full independence to decide on release of confidential data. In addition, in sec. 10 it is said that "Data processing shall take place in accordance with good statistical practice and the international recommendations and procedures generally applied in the field of statistics."

The Statistics Act constitutes the general framework for the professional independence of the statistical bodies. The independence is realized through the "Performance Target Document for the Year 2007" contracted between SF and the Ministry of Finance ("Statistics Finland

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<sup>1</sup> "After consulting with those obliged to provide data, or with their representatives, a statistical authority shall decide on the data to be collected and on the procedures and time limits to be applied in the collection of the data."

improves the quality of statistics by means of statistical methodology and by concentrating on the mutual coherence of statistics...."). Statistics Finland is responsible for approving its own statistical programme.

There is a general law for Finnish civil servants stating that they must be independent of interference (Administrative Procedure Act 434/2003, Sec. 6). In addition politicians and other administrations in Finland appear to be well aware of the importance of statistical independence. Recent changes of government have had no discernible effect on the status of statistics in Finland.

*Indicator 1.2: The head of the statistical authority has sufficiently high hierarchical standing to ensure senior level access to policy authorities and administrative public bodies. He/She should be of the highest professional calibre.*

Assessment: Fully met

Comments: The nomination of the Director General is not based on a fixed term. The position corresponds to one of the highest rankings in the public sector. Unlike in many other countries in Europe, the position is advertised publicly. The decision paper is available for the public.

*Indicator 1.3: The head of the statistical authority and, where appropriate, the heads of its statistical bodies have responsibility for ensuring that European Statistics are produced and disseminated in an independent manner.*

Assessment: Fully met

Comments: As SF is classified as independent in overall statistics production it is also independent in European statistics production (see also Act of Statistics Finland, 2004, Sec. 1, ref. on Council Regulation (EC) No 322/97, (4)). The "Performance Target Document for the Year 2007" lists the production of European statistics as one major task of SF. Furthermore, the OSF has a co-operation group for EU-matters appointed by the Ministry of Finance. The group works under Statistics Finland's direction and includes all relevant Ministries and statistical authorities. SF gives compliance to EU requirements the highest priority. Additionally, this goal is supported by traineeship periods for employees at Eurostat.

*Indicator 1.4: The head of the statistical authority and, where appropriate, the heads of its statistical bodies have the sole responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releases.*

Assessment: Fully met

Comments:

The director general decides on the statistical methods, standards and procedures. The "Performance Target Document for the Year (2007)" describes the framework and the global goals to be reached but no details how the work has to be done. The timing of statistical releases is planned by SF and is pre-announced through a publication calendar. Only SF is responsible for the contents of their publications.

*Indicator 1.5: The statistical work programmes are published and periodic reports describe progress made.*

Assessment: Fully met

Comments: Statistics Finland publishes annual reports. The report for 2006 describes the major topics of the year. In 2006 these were, for instance, the internal audit focusing on quality and coherence of the statistics content and methods, a study of regional economic structures, the revised Consumer Price Index, the offering of election data online, etc. Information about the work programmes, statistical releases, metadata, database, publications, etc. are available in the Internet ([http://www.stat.fi/index\\_en.html](http://www.stat.fi/index_en.html)).

*Indicator 1.6: Statistical releases are clearly distinguished and issued separately from political/policy statements.*

Assessment: Fully met

Comments: Statistical releases of SF contain no political statements. On rare occasions when something in other publications of Statistics Finland might be construed as being opinion, there is a disclaimer.

*Indicator 1.7: The statistical authority, when appropriate, comments publicly on statistical issues, including criticisms and misuses of official statistics.*

Assessment: Fully met

Comments: There is no specific regulation that entitles SF to comment on misuses. If an incorrect use is detected, SF systematically tries to contact the editor responsible to explain the issue. If necessary an official letter from the Director General was sent.

## **Principle 2: Mandate for Data Collection**

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

Overall assessment: Statistics Finland has the mandate to collect data for statistical purposes once it has consulted data providers. The legal situation permits SF to adapt statistical instruments quickly in a changing world. SF is not only allowed but explicitly requested to use administrative data if possible. Generally, respondents should not be obliged to provide the data but the NSI can compel response, if this is fixed in law. There is no compulsion for individuals to respond but legislation may require other bodies to do so. SF prefers persuasion to imposing penalties. The relevance of international statistical co-operation is mentioned specifically in the Statistical Act (280/2004, Chap. 1, Sec. 3). Unlike some other EU countries, SF does not have to rely on EU legislation to justify data collection.

*Indicator 2.1: The mandate to collect information for the production and dissemination of official statistics is specified in law.*

Assessment: Fully met

Comments: The mandate to collect data for statistical purposes is fixed in the Statistics Act (280/2004). The right to collect data from the state authorities, local government authorities, incorporated enterprises, unincorporated public enterprises, and non-profit institutions etc. is included (Sec. 14 and 15).

In the act the principles of collection, the rights of the respondents, aspects of data processing, quality and confidentiality are laid down. In general, the respondents should not be obliged to provide data unless laid down in law (Statistics Act 280/2004, Sec. 4). The NSI is held to collect the data in an economical way: the respondents should incur the minimum amount of costs and inconvenience.

*Indicator 2.2: The statistical authority is allowed by national legislation to use administrative records for statistical purposes.*

Assessment: Fully met

Comments: The Statistical Act states that statistics has to use administrative data and registers as a primary source (280/2004, Sec. 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.").

SF derives 96% of the basic data from registers (for example, the Population Information System and registers of tax authorities). There is close co-ordination and co-operation with the register keepers. SF is a member of the Advisory Board of Base Registers.

*Indicator 2.3: On the basis of a legal act, the statistical authority may compel response to statistical surveys.*

Assessment: Fully met

Comments: The Statistical authorities can compel bodies other than individual persons to respond if this is laid down in law (Statistical Act 280/2004, Sec. 4). If respondents are obliged to provide data they should receive appropriate feedback about the results free of charge (Sec. 9; exception: state authorities). The NSI has the possibility to release the respondent from the obligation in the case that providing of data leads to unreasonable inconvenience, and the result is not influenced through dropout (Sec. 8).

If those who are obliged to provide data wilfully fail to provide it, provide it after the deadline or provide false data, penalties can be imposed subject to the Statistics Act, Sec. 23 and 25 – but the main focus lays in the fulfilment of the obligation. However SF prefers a consensual approach and during recent years has not seen it necessary to impose fines.



### **Principle 3: Adequacy of Resources**

*The resources available to statistical authorities must be sufficient to meet European Statistics requirements.*

Overall assessment: Statistics Finland is a relatively well resourced organisation. In 2006, its salaried staff consisted of 844 employees. This situation is stable. They are highly qualified and well trained. Retention of staff is not a problem, although there will be a higher than normal retirement rate in the coming years; however, SF has instigated a plan to remedy this.

Its financial means are deemed to be adequate, with total operating costs amounting to €55m in 2006. Around three-quarters of its expenditure is accounted for by its wage bill. 80% of the resources come from the state budget, 15% from income from services and publications, 3% from grants and 2% from outside sources. Outputs grow faster than the inputs, so productivity is constantly increasing.

*Indicator 3.1: Staff, financial, and computing resources, adequate both in magnitude and in quality, are available to meet current European Statistics needs.*

Assessment: Fully met

Comments: The staff quota is about what might be expected in a country with this level of population. At the time of the ROSC assessment, the IMF in its 2005 report rated the staffing levels on macroeconomic statistics "broadly sufficient, but tight". The Bank of Finland shares this opinion. The staff are well qualified, with well over half having an university or a doctoral degree. Training amounts annually to an average of 6 man-days per employee. There is a low level of staff leaving for alternative employment (less than 2%) and an increasing internal mobility rate (97 people in 2006). Recently SF has been given more flexibility with respect to pay scales, so higher quality officials can be retained.

The Personnel 2010 Programme is a strategic plan aimed at building a brand as a good employer. It covers staff competence, rewards and well being and management. SF is aware of the problems of the ageing of its staff and has developed a Human Resources Plan for 2007-11 to counter a higher than average anticipated level of retirements.

The financial and computing resources are adequate. There is very little out-sourcing. Special analyses contribute around €3.5m per year to SF's resources; this is on the basis of recovering the full cost of the value added so SF is not reliant on this funding. There is full budgetary flexibility, over a two-year period, although staff numbers are subject to restrictions. An investment plan covers computing resources and staff training.

Rigorous strategic planning and decision making ensures that priorities are clearly set. European Statistics appear to have a privileged position in the priorities of the office.

*Indicator 3.2: The scope, detail and cost of European Statistics are commensurate with needs.*

For European level reply

*Indicator 3.3: Procedures exist to assess and justify demands for new European Statistics against their cost.*

For European level reply

*Indicator 3.4: Procedures exist to assess the continuing need for all European Statistics, to see if any can be discontinued or curtailed to free up resources.*

For European level reply

#### **Principle 4: Quality commitment**

*All ESS members commit themselves to work and co-operate according to the principles fixed in the Quality Declaration of the European Statistical System.*

Overall assessment: Statistics Finland has a clear commitment to Quality, both in legislation and in practice. Section 11 of the Statistics Act is devoted to quality and availability of statistics, stating that statistics have to be as reliable as possible and reflect conditions in society correctly.

TQM was introduced in the early 1990s. More recently, SF participated in Excellence Finland's 2006 Finnish Quality Award (scoring 350-400, being placed near the top organisations in its category).

Quality is an issue mainstreamed throughout the office through guides on professional ethics and quality. The current performance target document calls for constant improvement, although no quantitative targets are set. A quality manager is located in the secretariat of the DG; there is a network of quality auditors, co-ordinated by the Statistical R&D section. In addition there are 27 members of staff who have obtained a quality training certificate from Excellence Finland and they form their own network in addition to their usual tasks. Annual service level agreements contain measurable information on quality components. SF runs an annual internal quality competition for staff with cash prizes.

SF aims to develop OSF as a trademark of well-founded official statistics, distinguishable from other statistical information. Users appreciate this branding.

Finland has a high level of compliance with EU legislation. In the general compliance report, there is only one specific mention of Finland not adhering to legislation and that refers to a technical issue concerning the Labour Cost Index. As regards sectoral evaluations, all categories in Business Statistics are "very good", the quality of Quarterly Financial Accounts is "good overall" and SF comes out well in respect of Quarterly non-financial accounts. The IMF ROSC assessment scores Finland highly.

SF has conducted a customer survey since 1992 – first annually now biannually. In a survey of users of macroeconomic statistics, SF scored between 3.9 and 4.3 on an overall quality rating of 1-5. 85% of users feel that information is "very" or "rather" reliable.

Users in general feel that quality is good and to some extent participate in discussions on quality.

*Indicator 4.1 Product quality is regularly monitored according to the ESS quality components.*

Assessment: Fully met

Comments: There is close monitoring of almost all products; the results are widely disseminated and followed up. The Advisory Board of OSF requires producers to "regularly evaluate the quality of the statistics they produce" against criteria that have recently been updated to meet the requirements of the CoP. The absence of an internal audit of statistical product quality was a weakness acknowledged in the self-assessment, but now been corrected.

*Indicator 4.2 Processes are in place to monitor the quality of the collection, processing and dissemination of statistics.*

Assessment: Fully met

Comments: In January 2007, the Advisory Board of OSF recommended that a quality report should be attached to all OSF products, published free of charge on the internet at the same time as the statistics concerned are published. This is currently the case for 186 data collections.

Process quality is covered in the quality reports. In addition, thorough reviews of processes were recorded in the submission for the Finnish Quality Award Competition.

*Indicator 4.3 Processes are in place to deal with quality considerations, including trade-offs within quality, and to guide planning for existing and emerging surveys.*

Assessment: Largely met

Comments: Planning and survey design are covered extensively in the Quality Guidelines of Official Statistics. In addition the quality reports attached to each statistical release refer to these and other aspects. There is no formal process to deal specifically with the trade-offs.

However SF has been very active in this field for a number of years and feels that the correct trade-off balance has already been achieved. Such processes are implicit rather than formal. Sometimes the publication of non-market sensitive statistics is delayed to improve other aspects of quality.

*Indicator 4.4 Quality guidelines are documented and staff are well trained. These guidelines are spelled out in writing and made known to the public.*

Assessment: Fully met

Comments: SF communicates its commitment to quality throughout the office. Quality and reliability form a chapter in the Guidelines on Professional Ethics. The Quality Guidelines for Official Statistics is a comprehensive manual laying out principles and guidelines for the norms and quality of statistics, and on statistical surveys, documentation and dissemination. Both these manuals are binding on staff who are aware of their obligations.

*Indicator 4.5 There is a regular and thorough review of the key statistical outputs using external experts where appropriate.*

Assessment: Largely met

Comments: All outputs are reviewed internally; external reviews are only considered to be appropriate for 25% of them.

For example, the IMF ROSC report on major economic statistics rates SF's performance highly and stated that its managers "are highly aware of all dimensions of quality". Finland performs very well in compliance with EU legislation.

The quality guidelines quote the EFQM principle that quality must be evaluated continuously, often from different perspectives. However the same manual states that "it is rare that end-users are in a position to assess the quality of statistics produced", so the burden is put on the producer. This would imply that there is little input from outside the statistics producing community.

### **Principle 5: Statistical confidentiality**

*The privacy of data providers (households, enterprises, administrations and other respondents), the confidentiality of the information they provide and its use only for statistical purposes must be absolutely guaranteed.*

Overall assessment: Statistical confidentiality is guaranteed by law. Respondents have full confidence in SF to maintain confidentiality. Breaches of statistical confidentiality are punishable. All staff sign the confidentiality declaration.

*Indicator 5.1 Statistical confidentiality is guaranteed in law.*

Assessment: Fully met

Comments: Statistical confidentiality is guaranteed by law (Statistical Act 280/2004; Sec. 10, 12 and 13; Act on Openness of Government Activities, Section 24, Sub-section 1, Paragraph 16, Personal Data Act 523/1999, esp. Sec. 15 and 27). Besides this legal basis the NSI points out the ethical aspect of confidentiality fixed in international documents like the Declaration on Professional Ethics of the International Statistical Institute (ISI, 1985) and the Finnish Guidelines for Professional Ethics ([www.stat.fin/org/etiikka/ettinenopas\\_en.pdf](http://www.stat.fin/org/etiikka/ettinenopas_en.pdf)).

The national authority in charge of personal data protection is the Ombudsman for Data Protection and his office under the Ministry of Justice. The Ombudsman supervises processing of individual data in Finland generally. Due to the Finnish Data Protection Law there is no official Data Protection Commissioner at SF, but there is a Data Protection Board that decides on specific cases. The director of the involved statistical operating unit is responsible for the protection of personal data in the output produced by his/her unit.

*Indicator 5.2 Statistical authority staff sign legal confidentiality commitments on appointment.*

Assessment: Fully met

Comments: Statistics Finland has developed two major papers concerning data confidentiality: "Guidelines for Protecting Personal Data in Table Format" (2002) and "Guidelines for Protecting Data on Enterprises in Table Format" (2000). The guidelines introduce the problems

of data protection, reference the legal situation, discuss possible risks depending on the data structure and the analysis and define procedures to handle the problems.

Additionally, the document "Statistics Finland Information Security Plan" (2002) states the very important aspect of human and not only technological "responsibility" for the security of data ("Information security cannot be guaranteed by technological measures only"). Also the "Guidelines on Professional Ethics" reference on confidentiality.

All staff have been required to sign the confidentiality commitment since end 2006.

*Indicator 5.3 Substantial penalties are prescribed for any wilful breaches of statistical confidentiality.*

Assessment: Fully met

Comments: Penalties for breaching confidentiality are fixed in the Statistical Act (Sec. 24) with reference to the Penal Code (39/1889; Sec. 1 or 2 Chap. 38; Sec. 5 Chap. 40). Any secrecy offence is penalized through a fine or imprisonment for at most one (Chap. 38) or two (Chap. 40) years. There have been no known breaches in recent memory.

*Indicator 5.4 Instructions and guidelines are provided on the protection of statistical confidentiality in the production and dissemination processes. These guidelines are spelled out in writing and made known to the public.*

Assessment: Fully met

Comments: SF has two major documents (Guidelines on Non-disclosure and Release of Statistical Data prior to their Publication; Guidelines for Protecting Personal Data in Table Format). They cover micro- and macro-data protection. These documents are directed towards employees and are made publicly available – especially, for the scientific community, which accepts the competence of SF in this respect.

*Indicator 5.5 Physical and technological provisions are in place to protect the security and integrity of statistical databases*

Assessment: Fully met

Comments: IT-Security is the responsibility of the top management and the operation remains within the house. The top management is responsible for the information security plan (document: Statistics Finland Information Security Plan), baseline security definitions and procedural instructions. Furthermore, Statistics Finland has decentralized the information security responsibilities to the different parts of the organization. The basic principle is that every employee is involved with his/her special duties in IT-security.

The implementation of IT is based on British Standard 7799; there was no formal certification, but there have been external audits. SF's regional offices are connected into the network by encrypted connections. For usability reasons the PCs at the working places have the USB-Port working and are equipped with CD or DVD. That opens the theoretical possibility to import or export data, although this is not allowed.

**Indicator 5.6 Strict protocols apply to external users accessing statistical microdata for research purposes.**

Assessment: Fully met

Comments: There has been an increase in the demand for microdata, anonymized data on separate individuals and enterprises. The limitations for usage of microdata are given through the Statistics Act that states that data collected for statistical purposes are confidential. Exceptions are made for scientific research taking into account that the released data should not allow the re-identification of the data subject/provider. SF releases about 200 research data sets. If the data sets cannot be released outside for data protection reasons, the researchers have the opportunity to use the in-house research laboratory.

The director of the statistical department of SF decides about the release of the data. In the case of difficult decisions the SF Ethics Committee is additionally involved. Whether or not the data should be released to foreign countries, is decided by the Director General upon consultation of the Ethics Committee.

Although there is no screening of individual researchers, there are strict ex-ante controls of the purpose for which the data is to be used. If approved the researchers must sign a declaration concerning this use and an undertaking to destroy it when finished.

Researchers may be permitted take away personal anonymized data for use outside, but this is not possible for enterprise data.

**Principle 6: Impartiality and objectivity.**

*Statistical authorities must produce and disseminate European Statistics respecting scientific independence and in an objective, professional and transparent manner in which all users are treated equitably.*

Overall assessment: Generally, there is good compliance with the principle of objectivity and impartiality according to the indicators selected.

Statistics are compiled on an objective basis determined by statistical considerations, errors discovered in published statistics are corrected as soon as possible, and all users have equal access to statistical releases.

In this area many documents exist – Publishing policy of SF, Guidelines on Professional Ethics, Quality Guidelines, Guidelines on the Granting of User Licence to Statistics Finland’s Unit-level Data etc.

**Indicator 6.1: Statistics are compiled on an objective basis determined by statistical considerations.**

Assessment: Fully met

Comments: According to the Statistics Act (280/2004, Sec 11 – Quality and availability of statistics) statistics shall be as reliable as possible and shall give a truthful picture of the social conditions and their development.

The SF Guidelines on Professional Ethics state “All operations shall be based upon professional considerations, scientific principles and professional ethics.”

Quality Guidelines include detail description of statistical methods, which should be used in statistical work.

There has never been an accusation of lack of objectivity.

*Indicator 6.2: Choices of sources and statistical techniques are informed by statistical considerations.*

Assessment: Fully met

Comments: The SF Guidelines on Professional Ethics state: "The sources, methods and procedures of statistics shall be based upon scientific standards."

No evidence was found for political influence in the choice of sources or the statistical techniques.

*Indicator 6.3: Errors discovered in published statistics are corrected at the earliest possible date and publicised.*

Assessment: Fully met

Comments: Guidelines on revisions to published statistical data and publication errors were published in July 2007. Emphasis is put on advance preparation, immediate reaction, documentation and informing and communication. Corrections are denoted by special signs in tables. Users are informed by e-mail when more important correction occurs. There is an internal list of corrections made to enable monitoring and future avoidance.

*Indicator 6.4: Information on the methods and procedures used by the statistical authority are publicly available.*

Assessment: Largely met

Comments: Guidelines on professional ethics: "In order that the reliability of statistics can be assessed, all the methods used in compiling the statistics shall be public and generally accepted. Quality descriptions shall be attached to each statistical product so that users can establish the reliability of the information presented as well as any risks of inaccuracies. The aim is to promote the proper use and interpretation of statistics".

The website contains, for each data collection, a description, quality description, methodological descriptions, concepts and definitions. These are currently almost complete.

*Indicator 6.5: Statistical release dates and times are pre-announced.*

Assessment: Fully met

Comments: The release calendar is published on the website – i.e. ([http://www.stat.fi/ajk/julkistamiskalenteri/index\\_en.html](http://www.stat.fi/ajk/julkistamiskalenteri/index_en.html)). Published at the beginning of each year, the statistical release calendar lists the date of release (day or week) of forthcoming Statistics Finland products. In the case of statistics subject to insider rules and certain other statistics on economic trends, the exact date of release is always given. Publication dates can be changed during the year (in practice this occurs about 10% of the time, but only for annual data and non-market-sensitive data); however users are informed well in advance of such changes.



*Indicator 6.6: All users have equal access to statistical releases at the same time and any privileged pre-release access to any outside user is limited, controlled and publicised. In the event that leaks occur, pre-release arrangements should be revised so as to ensure impartiality.*

Assessment: Largely met

Comments: All users have equal access; other parts of the administration are not informed before release time. No leaks have occurred.

Members of the media are occasionally informed in advance under embargo in controlled conditions, but only for annual data and non-market-sensitive data. Such access is not publicly known.

*Indicator 6.7: Statistical releases and statements made in Press Conferences are objective and non-partisan.*

Assessment: Fully met

Comments: A small number of press conferences is organised each year on specific occasions, but SF does not feel that this is any longer an appropriate way of communicating with the press due to the availability from the Internet. There is no official procedure, but a strong responsibility on individual directors. Staff are trained on relations with the media. Press conferences are objective and non-partisan.

### **Principle 15: Accessibility and clarity**

*European Statistics should be presented in a clear and understandable form, disseminated in a suitable and convenient manner, available and accessible on an impartial basis with supporting metadata and guidance.*

Overall assessment: Generally there is good compliance with this principle. SF is an open and transparent organisation. There is good communication with users. Ministers are never given access to statistics in advance of publication. The website has recently been overhauled and is compliant with accessibility guidelines.

Basic statistical information is always provided free of charge, but tailor-made data sets and analyses are provided upon request, sometimes subject to a charge. Pricing at SF is based on the Act and Decree on the Charge Criteria of the State and a subsequent decision of the Ministry of Finance. SF is therefore obliged to cover its costs for such activities.

*Indicator 15.1: Statistics are presented in a form that facilitates proper interpretation and meaningful comparisons.*

Assessment: Fully met

Comments: The Guidelines on professional ethics state “statistics shall be presented in a clear, readily understandable form. Statistics intended for the broader public must be easily intelligible to all.”



Statistics Finland's **eCourse** in Statistics is designed to provide all users with instructions about how to make the best possible use of statistics by describing their contents and different uses.

The Guidelines on professional ethics also state "All information shall be interpreted and analysed by describing the scale and proportions of different phenomena and by explaining the causes and consequences of changes and phenomena. Where possible, the information contained within a given statistical product shall be compared to other statistical data related to the same phenomenon and to any other relevant information."

New website of SF complies with W3C Web Content Accessibility Guidelines, users are invited to comment on the content and presentation of statistical outputs and there is a procedure to follow-up these comments.

*Indicator 15.2: Dissemination services use modern information and communication technology and, if appropriate, traditional hard copy.*

Assessment: Fully met

Comments: SF provides very good service for its users via Internet site. More than 75 per cent of its statistical outputs are available via its Internet site. A user-friendly output database is used by SF. Also printed outputs are publicly available.

The new version of the website is compliant with W3C guidelines. It was the subject of an external evaluation by a specialised company. Many users, including the press, appreciate the new website.

*Indicator 15.3: Custom-designed analyses are provided when feasible and are made public.*

Assessment: Largely met

Comments: Tailored statistical services are produced e.g. from basic statistical data, by combining data files, as compilations from international data files or by combining statistical background data with a customer's own material (e.g. customer profiles). The end result may consist of statistical tables or figures, a statistical report containing an analysis, a thematic statistical map or a research project with the associated reports. There are charged at cost recovery rates. SF does not routinely make the results of the analyses public. Information about Tailor made services is publicly available at [http://www.stat.fi/tup/raataloidyt\\_en.html](http://www.stat.fi/tup/raataloidyt_en.html)

*Indicator 15.4: Access to microdata can be allowed for research purposes. This access is subject to strict protocols.*

Assessment: Fully met

Comments: See point 5.6

Some individual researchers find the high prices of the micro-data sets to be a barrier to access.

*Indicator 15.5: Metadata are documented according to standardised metadata systems.*

Assessment: Fully met

Comments: The Dublin Core and SDDS metadata formats are used in the office. SDDS descriptions are available for those statistics that are publicised on the IMF web service. Dublin Core is used for all webpages.

*Indicator 15.6: Users are kept informed on the methodology of statistical processes and the quality of statistical outputs with respect to the ESS quality criteria.*

Assessment: Fully met

Comments: There is a special training for users once a year concerned on European quality criteria. Guidelines on professional ethics: "In order that the reliability of statistics can be assessed, all the methods used in compiling the statistics shall be public and generally accepted. Quality descriptions shall be attached to each statistical product so that users can establish the reliability of the information presented as well as any risks of inaccuracies. The aim is to promote the proper use and interpretation of statistics".

The website contains, for each data collection, a description, quality description, methodological descriptions, concepts and definitions. These are currently almost complete.

#### **4. CO-ORDINATION ROLE OF THE NATIONAL STATISTICAL INSTITUTE**

Statistics in Finland is mainly centralised: SF is responsible for around three-quarters of the total expenditure on official statistics. The principle behind the Statistics Act is that SF is responsible for all statistics except those for which it would be more appropriate for another body to be. Several statistics from the other producers have been moved to SF in recent years.

The Statistics Act (280/2004) defines the "Statistical Authorities", consisting of Statistics Finland, as the general authority within the National Statistical Service and three other specialist statistical agencies (the Information Centre of Ministry of Agriculture and Forestry, the Board of Customs and the National Research and the Development Centre for Welfare and Health, see Statistics Act, Sec. 2) and "Other authorities producing statistics", 13 government departments which produce statistics in their own areas of responsibility (such as like the National Land Survey of Finland, Agrifood Research Finland, the Finnish Forest Research Institute, the Finnish Game and Fisheries Research Institute, the Finnish Meteorological Institute), but unlike the "Statistical Authorities" have no data collection right in the Act. In addition, outside the scope of the Act, there are three "Other producers of Statistics", the Bank of Finland, the Finnish Centre for Pensions and the Social Insurance Institution. Of these 20 authorities, 9 are deemed to be producers for the ESS and they are well aware of the CoP and have already completed the self-assessments. They felt that this exercise provided an opportunity to assess their adherence to principles that have already been in practice for many years.

The autonomous territory of Åland islands has its own Statistics Act, which is fully compatible with the Statistics Act of Finland. Moreover, there is an agreement between SF and Statistics and Research Åland (ÅSUB) on the sharing of responsibilities and division of labour as regards

production of statistics about Åland. ÅSUB does not belong to the Advisory Board of OSF, but ÅSUB and SF co-operate closely and there are regular formal meetings.

The Advisory Board of Official Statistics of Finland consists of SF, plus representatives of seven of the "Statistical Authorities" and the "Other authorities producing statistics"; it is responsible for overseeing the publication and development of official statistics, quality criteria and maintenance. The Board is also responsible for cataloguing the Official Statistics of Finland which are defined as statistics produced by the organisations mentioned in the Statistics Act and amounted to 295 sets of statistics at the end of 2006. OSF now covers all the EU requirements.

Other producers of official statistics are mainly independent agencies subordinated to ministries and they have independent status usually both legally and regarding the use of their budget.

Overall, there is a good feeling of independence in the national system. SF produces a development plan for official statistics, after consulting the other agencies with statistical responsibilities, and there are frequent meetings with the other ministries at Director General level. In addition there is a number of other permanent co-ordinating bodies, including a Scientific Board, plus many specialised expert groups for users as well as co-operation groups for data providers and registration authorities. A co-operation group for official statistics on EU matters has also been created. Finland's position with regard to EU statistics has been delegated to Statistics Finland by the Ministry of Finance.

There are special arrangements for co-operation with organisations outside the scope of the Statistics Act, such as the Bank of Finland with whom the division of labour mirrors that between Eurostat and the ECB.

There seems to be a great deal of goodwill amongst the statistical family in Finland to co-operate well with each other. The legislation makes the responsibilities of each organisation clear so there are no turf wars.

There is a network of contact persons amongst all the agencies that meets formally at least once a year and operates informally as well. There is a Bulletin of Finnish Official Statistics published three to four times a year.

Although there is no central career development for official statisticians, SF does make its training available to staff in the other agencies.

The fact that so much of SF's data collection comes from administrative information (96% of SF's basic data items) means that there has to be effective co-operation mechanisms amongst the relevant register authorities and other register keepers.

## **5. GOOD PRACTICES TO BE HIGHLIGHTED**

### **Quality**

- The network of quality auditors within the office has common meetings and co-ordinates quality work in the departments.
- 27 officials have obtained national quality training certification after a 11 day training on quality.
- Participation in national EFQM Award Competition gave a thorough evaluation report and benchmarking with best Finnish organisations. SF scored 351-400 points, the threshold for the EFQM Recognised for Excellence label is 400 points.

- Internal quality competition activates once a year units and persons to represent their good practices or projects building up SF strategy. Best projects and practices are prized with money.
- Active contribution to European quality activities.
- There is an internal list of corrections made to published data which is used to determine the reasons for errors and to avoid them in future. List is part of the regular follow up procedure.

### **Documentation**

- Publishing policy of Statistics Finland (in Quality Guidelines for Official Statistics, 2<sup>nd</sup> Edition).
- Guides and manuals for employees (e.g. Guide on Professional Ethics, Quality Guidelines for Official Statistics, Guidelines on the Granting of User Licence to Statistics Finland's Unit-level Data etc.).

### **Communication**

- Open and transparent management of the office.
- Statistics Finland's **eCourse** in Statistics ( [http://www.stat.fi/tup/verkkokoulu/index\\_en.html](http://www.stat.fi/tup/verkkokoulu/index_en.html))
- Invitation of parliamentary groups to visit Statistics Finland at the start of a new Parliament. Practically all groups attend in their turn. The visit contains a presentation of Statistics Finland, presentation of its operating principles and reviews of up-to-date statistics.

### **Other**

- Screening of the research projects rather than the researchers, when granting permissions to use micro data. When researchers are granted a permission to use micro-data, their research plan has to be attached to the application.
- New integrated production system. System defines a production model and makes possible a target oriented development of statistics production. System standardises dissemination of statistics as an XML-based process, where one document or data can automatically be formatted into different type of publications (printed publication, web page etc.).

## **6. RECOMMENDATIONS OF THE PEER REVIEW TEAM**

### 1. Recommendations related to legal framework of Statistics Finland

None.

### 2. Other recommendations

- Better communication of pricing policy.
- Look into the possibility of "campus use files" for students, perhaps on a European scale.
- Better links between statistical authorities on the website.
- Dynamic system on the website to enable users to create individual designed tables (currently under construction).
- Investigate the possibility of more external reviews of statistical products.

## 7. LIST OF IMPROVEMENT ACTIONS BY PRINCIPLE OF THE CODE

<b>Principle 3: Adequacy of Resources</b>	
Improvement actions	Timetable
<ul style="list-style-type: none"> <li>* Updating the learning strategy</li> <li>* Developing leadership and supervisory work at SF</li> <li>* Implementation and finalisation of the productivity programme of SF</li> </ul>	<ul style="list-style-type: none"> <li>- 2008</li> <li>Ongoing</li> <li>- 2010</li> </ul>

<b>Principle 4: Quality Commitment</b>	
Improvement actions	Timetable
<ul style="list-style-type: none"> <li>* Increasing the efficiency of quality work (process quality, product quality, internal and external audits), better communication</li> <li>* Support of the implementation of CoP in the whole OSF</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> <li>- 2009</li> </ul>

<b>Principle 5: Statistical Confidentiality</b>	
Improvement actions	Timetable
<ul style="list-style-type: none"> <li>* Seeking the financial support in order to establish remote online access to micro data</li> <li>* A project investigating how to integrate automatic disclosure control better to our IT-techniques</li> </ul>	<ul style="list-style-type: none"> <li>- 2008</li> </ul>

<b>Principle 6: Impartiality and Objectivity</b>	
Improvement actions	Timetable
<ul style="list-style-type: none"> <li>* Completing metadata on website (quality description, methodological description, concepts and definitions)</li> <li>* Specification of embargo rules concerning statistics</li> </ul>	<ul style="list-style-type: none"> <li>- 2009</li> <li>- 2007</li> </ul>

<b>Principle 7: Sound Methodology</b>	
Improvement actions	Timetable
<ul style="list-style-type: none"> <li>* The second phase of the personnel training program (training in statistical processes, methodology, IT techniques)</li> <li>* Implementation of the results of the Production Model project</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> <li>Ongoing</li> </ul>

<b>Principle 8: Appropriate statistical procedures</b>	
Improvement actions	Timetable
<ul style="list-style-type: none"> <li>* Development of data cleaning and editing/imputation systems</li> </ul>	

<b>Principle 9: Non-excessive Burden on Respondents</b>	
Improvement actions	Timetable
<ul style="list-style-type: none"> <li>* Measurement of response burden of direct data collection from enterprises, local governments and institutions</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing</li> </ul>

<b>Principle 10: Cost effectiveness</b>	
Improvement actions	Timetable
* Project management training and adoption of standardised project tools	Ongoing

<b>Principle 11: Relevance</b>	
Improvement actions	Timetable
* Strategy for economic statistics of SF	-2007

<b>Principle 12: Accuracy and Reliability</b>	
Improvement actions	Timetable
* A minimum standard for (process and product) quality indicators to be developed and implemented	

<b>Principle 14: Coherence and Comparability</b>	
Improvement actions	Timetable
* Launching three coherence producing statistical programs: internationalisation of enterprises, data collection from enterprises, measurement of prices and volumes	-2011
* Developing the standard presentation of OSF statistics on the Internet	-2009

<b>Principle 15: Accessibility and Clarity</b>	
Improvement actions	Timetable
* Thematic and user oriented interfaces on the Internet	- 2008
* Developing the communication to and feedback from different customer groups	- Ongoing
* Implementation of common metadata standards for all statistics	- 2009
* Developing free statistical self-service on the Internet for the whole OSF (common portal of different producers for external users)	- 2009

## 8. ANNEX A: PROGRAMME OF THE VISIT

Wednesday 8.8.2007 - Discussion with internal stakeholders

9.30-10.00	Welcome and introduction of program
10.00-11.30	Meeting with management and senior staff, principles 1, 2 and 3
11.30-12.00	Meeting with management and senior staff, principle 5
12.00-12.30	Meeting with management and senior staff, principles 6 and 15
12.30-13.30	Lunch break
13.30-14.30	Interview with DG and Quality Manager, principle 4
14.30-15.30	Meeting with junior staff, principles 1-6 and 15
15.30-17.00	Statistics Finland presentations

Thursday 9.8.2007 - Discussion with external stakeholders

9.30-10.30	Meeting other producers of official statistics in Finland
10.30-11.30	Meeting with Ministries and Bank of Finland
11.30-12.30	Meeting with users of statistics
12.30-14.00	Lunch break
14.00-15.00	Meeting with representatives from universities and research institutes
15.00-16.00	Meeting with media
16.00-17.00	Meeting with representatives of respondents

Friday 10.8.2007 - Conclusions

9.30-11.00	Meeting with management to sum-up and detailed review the list of improvement actions for all principles
11.00-12.00	Meeting with top management: conclusions, recommendations and follow-up (improvement actions)
12.00-13.00	Lunch

## 9. ANNEX B: LIST OF PARTICIPANTS

### 9.1. Statistics Finland

Ms Heli Jeskanen-Sundström, Director General  
Mr Jarmo Hyrkkö, Deputy Director General  
Ms Riitta Harala, Director, Social Statistics  
Mr Jari Tarkoma, Director, Population Statistics  
Mr Ari Tyrkkö, Director, Economic Statistics  
Ms Kaija Hovi, Director, Business Structures  
Ms Hannele Orjala, Director, Business Trends  
Ms Heli Mikkela, Director, Information Services  
Mr Sven-Folke Björkqvist, Director of Data Administration  
Ms Hilikka Vihavainen, Director of International Affairs  
Ms Tuula Kuivalainen, Marketing Director, Information Services  
Mr Ilkka Hyppönen, Deputy Director General, Statistics Production

Mr Ilkka Lehtinen, Senior Adviser, Prices and Wages  
Ms Tuula Hausmann, Senior Adviser, Secretariat of Director General  
Ms Johanna Rantanen, Legal Adviser, Management Services  
Mr Kari Djerf, Senior Adviser, Statistical Research and Development  
Mr Markku Huttunen, Contact Manager, Information Services  
Mr Pentti Pietilä, Senior Adviser, Secretariat of Director General  
Mr Rami Peltola, Head of Statistics, Business Structures  
Mr Antti Katainen, Senior Statistician, Prices and Wages  
Ms Paula Paavilainen, Senior Statistician, Prices and Wages  
Ms Villiina Hellsten, Senior Statistician, Statistical Research and Development  
Ms Laura Iisakka, Senior Statistician, Social Statistics  
Mr Ville Vertanen, Senior Statistician, Business Trends  
Ms Saara Roine, Senior Statistician, Economic Statistics  
Mr Antti Pasanen, Senior Statistician, Economic Statistics  
Ms Janika Konnu, Researcher, Statistical Research and Development  
Ms Anu Alanko, Senior Adviser, Business Trends  
Mr Jussi Melkas, Senior Adviser, Secretariat of Director General

## 9.2. External

Mr Timo Koskimäki, Head of Statistics, National Board of Customs  
Mr Tommi Laukka, Statistician, The Social Insurance Institution of Finland  
Mr Martti Aarne, Head of Statistics, Finnish Forest Research Institute  
Mr Olli Nylander, Director, National Research and Development Centre for Welfare and Health  
Mr Mika Gissler, Senior Adviser, National Research and Development Centre for Welfare and Health  
Mr Mikko Pellinen, Head of Statistical Department, The Finnish Centre for Pensions  
Ms Leena Storgårds, Manager of Statistical Unit, Information Centre of the Ministry of Agriculture and Forestry in Finland  
Mr Tapani Säynätkari, Senior Planner, Finland's Environmental Administration  
Mr Aki Tornberg Counsellor of Education, Ministry of Education  
Ms Hanna-Leena Männistö, Manager, Bank of Finland  
Mr Jorma Hilpinen, Adviser, Bank of Finland  
Ms Mirja Kosonen, Senior Inspector, Ministry of Trade and Industry  
Ms Elina Nikkola, Senior Inspector, Ministry of Agriculture and Forestry  
Ms Tuulia Hakola, Director, Structural Policy Unit, Ministry of Finance  
Ms Asta Manninen, Acting Director, City of Helsinki Urban Facts  
Ms Kristiina Tikkala, Senior Advisor, City of Lohja  
Mr Ari Lainevuori, Research Chief, Uusimaa Regional Council  
Mr Matti Räisänen, Representative, Federation of Finnish Commerce  
Mr Eugen Koev, Head of Research, Confederation of Unions for Academic Professionals  
Ms Rita Asplund, Research Chief, The Research Institute of the Finnish Economy  
Mr Pekka Ilmakunnas, Professor, Helsinki School of Economics  
Mr Kauko Aromaa, Director, The European Institute for Crime Prevention and Control  
Ms Reima Suomi, Professor, Turku School of Economics  
Ms Elli Heikkilä, Research Chief, Institute of Migration  
Mr Pentti Moilanen, Researcher, Finnish Game and Fisheries Research Institute  
Mr Jouni Luotonen, Managing Editor, Talouselämä-magazine  
Ms Pirjo Valpas, Information Services Chief, Talouselämä-magazine  
Mr Mikael Bobacka, Graphic Designer, Hufvudstadsbladet-newspaper  
Mr Antti Parviala, Economic Journalist, YLE, National Broadcasting Company  
Mr Ralf Ramm-Schmidt, Leading Expert, Confederation of Finnish Industries  
Mr Risto Suominen, Director, The Federation of Finnish Enterprises  
Ms Louna Kiuru, Legal Adviser, National Board of Patents and Registration of Finland  
Mr Timo Salovaara, Development Manager, Population Register Centre