

Report of the Peer Review of the French Statistical Office (Insee) on the implementation of the European Statistics Code of Practice

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1. EXECUTIVE SUMMARY

The objective of the peer review was to assess the degree of compliance of Insee (Institut National de la Statistique et des Etudes Economiques) with principles 1-6 and 15 of the European Statistics Code of Practice. The review team — chaired by Adrian Redmond (CSO, Ireland) and also consisting of Pedro Diaz Muñoz (Eurostat) and Marc Debusschere (Statistics Belgium) — visited Insee on 24-26 January 2007. Interviews took place with the management and staff of Insee and its regional offices, heads of the ministerial statistical services, members of the CNIS (Conseil National de l'Information Statistique) and its subcommittees (representing users, producers and data suppliers), key stakeholders and the media.

The main findings are as follows.

- While Insee does not have legal independence in statistical matters, in practice professional independence is a strong part of its culture. But the fact that its independence is occasionally questioned in the media shows that there is the perception by some that this is not always the case.
- The statistical services in France have a strong legal basis for the collection of data, and also have good access to administrative data.
- The number and quality of staff are sufficient to meet statistical requirements. Financial resources, while leaving some room for improvement, are adequate, and the new LOLF (Loi Organique relative aux Lois de Finances) law gives Insee some financial flexibility.
- Quality procedures are present to a high degree in Insee, though they do not use a fully integrated quality management system. A recently developed quality action plan is now being implemented.
- Statistical confidentiality is well protected by law, despite some national peculiarities, and it is solidly installed as a value of the organisation. The dual legal framework, involving different treatment of business and household data, results in a certain complexity.
- Insee has good standards of impartiality and objectivity, and the users interviewed, including the media, regarded Insee and its products as objective and non-partisan.
- Insee has an extensive and widely used range of dissemination products, acknowledged by users to be of high quality. There is now a need to increase the range of documentation on the website, and to enhance the site's user-friendliness.
- Despite its high degree of functional and geographic decentralisation, the statistical system is strongly coordinated, both institutionally and technically. The key coordination role is performed by the CNIS, which has a broad mandate and which acts as a forum for dialogue between producers, users, and other stakeholders. Insee itself plays an important role in coordinating concepts, surveys, techniques and nomenclatures. It coordinates the work of the ministerial statistical services, acts as secretariat for the CNIS, manages the registers of individuals and enterprises, maintains the online portal to official statistics, and

represents the French official statistics system internationally. Insee also has the central responsibility for training and career-development.

- The good practices highlighted in the report are the well developed staff mobility system managed by Insee, the ambitious RESANE (REfonte des Statistiques ANnuelles d'Entreprises) project, which involves a radical redesign of the system of structural business statistics, and the convenient web portal that gives access to the official statistics released by Insee and the statistical services in the ministries.
- The recommendations of the peer review team, in summary, are:
 - that Insee be accorded, as soon as practicable, legal independence in statistical matters.
 - that the feasibility of separating Insee's statistical activities from its administrative activities should be examined.
 - that, when Insee has completed its project to extend its quality reporting to the full range of business statistics, quality reporting should be further extended to cover all household surveys.
 - that there should be an examination of the asymmetry in the treatment of business and personal microdata, and of the feasibility of creating a safe centre on Insee premises for researchers to access microdata.
 - that a document explaining the general statistical confidentiality rules and procedures be produced, and made available on the Insee website.
 - that Insee's policy of pre-release to authorities and the press be made more readily available on the Insee website.

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 completed their self-assessments, and 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. 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 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. In principle, the peer review is limited to the National Statistical Institute and its coordination 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.

On the basis of a three day visit on-site and information material provided by the National Statistical Institute and Eurostat prior to the review, the peer review yields a report assessing compliance with the Code of Practice at indicator level and by 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 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: In contrast to the general rule in other countries, the national statistical institute of France does not have legal independence in statistical matters. Nevertheless, we formed the opinion that, in practice, professional independence is a strong part of Insee culture and a strong value of its staff. Despite its lack of legal independence, it is generally well respected as a high quality statistical institute.

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.

Partly met

Comments: Insee is a Directorate General of the Ministry of Finance. While in practice it appears free of political and other external interference in statistical matters, this independence is not specified in law. Nor is there any national document on a code of practice or ethical standards in the area of official statistics. At the end of 2005, Insee submitted to the staff of the Minister of Finance a draft decree dealing with the professional independence, in statistical matters, of Insee and the ministerial statistical services (SSMs). The draft proposes that the statistical agencies have independence in methodology, as well as the content and timing of publications. This peer review did not discover any evidence of political interference, and indeed Insee itself states very clearly that this never occurs. Moreover, none of the users or media representatives interviewed questioned Insee's independence. Nevertheless, a debate on the matter occasionally surfaces in the media. During the review itself, and while this report was being finalised, the issue was getting intense coverage in the national media. A decision taken by Insee to delay the regular annual update of the employment figures was seen by some as being politically motivated. This example shows that, while Insee might be independent in practice, there is at least the perception by some that this is not always the case. As another example, a rather unusual feature of Insee's activities is its management of the registers of businesses (SIRENE), persons (RNIPP), and electors; these are managed by Insee for administrative as well as statistical purposes, without organisational separation. Occasionally, there is strong criticism in the media in relation to proposals or decisions (made politically, not by Insee) to extend the Insee register or personal

identification number to other areas, particularly in the fields of security and health, and this criticism could have the potential to damage Insee's credibility. At regional level, a decree of April 2004 gives limited protection to some of the activities of statisticians of Insee and the SSMs; in particular, the regional government authorities cannot interfere in statistical processes.

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.

Fully met

Comments: The Director General of Insee is at same level as the heads of other government departments, which is the same as the level of the highest non-political public servant. He or she is appointed by the Council of Ministers, which is chaired by the President of the French Republic. While the length of term not set, it is the tradition that Insee's Director General remains in office for a period that extends beyond the government's term of office. The Director General cannot be removed from office by a single minister, only by a decision of the Council of Ministers. We were informed that, on the one hand, none of the senior civil servants appointed by the Council of Ministers is given a set term, and on the other, that the Constitution gives complete freedom to the Council of Ministers to change these senior civil servants at any time.

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.

Fully met

Comments: While, as mentioned above, there is no legal basis to independence, in practice the head of Insee and the heads of the SSMs ensure, in their respective domains, that statistics are compiled and disseminated in an independent manner. Insee states emphatically that there has been no instance of statistics being submitted to political authorities for approval prior to dissemination.

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.

Fully met

Comments: The national commission for economic and social classifications (CNNES, a subcommittee of the Conseil National de l'Information Statistique or

CNIS) has an advisory role in relation to all official economic and social classifications used in France. Insee provides the Secretariat of the CNNES. When the subcommittee makes a recommendation on a classification, this is formally passed to the Minister for Finance for decision. However, the decision is actually taken by the Director General of Insee, to whom the Minister has delegated decision-making power in this field. Also, whenever a new statistical survey is proposed, it is brought before the CNIS to receive a public interest certification label. This is a two-step procedure, involving a usefulness opinion (given by a CNIS task force) and a quality certification (given by the CNIS quality label committee or Comité du Label). The quality label committee evaluates the implementation methods, including the main aspects of statistical methodology, planned by the survey department before awarding its quality mark and giving the survey its approval. As in the case of nomenclatures, the law gives the decision-making power to the Minister, and he has delegated it to the Director General.

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

Fully met

Comments: The CNIS has the overall responsibility for establishing the programme of official statistics. Insee, and other organisations producing statistics, submit their draft multiannual and annual statistical programmes to the CNIS, and after a recommendation by the committee they are formally approved by the Minister for Finance. In practice the opinion of the CNIS has always been followed by the Minister on the statistical programme for Insee, the SSMs, and other agencies producing statistics — in effect for the entire range of statistical services.

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

Fully met

Comments: Releases published by Insee (and its regional directorates) are clearly identified as emanating from Insee. They all follow a standard design, and they include the logo, the name of the Director General or the head of the regional office, and a copyright notice. There is a policy in place to ensure that no publication contains political statements, and all publications go through a system of checks in this regard. Similarly, in the case of the SSMs, all publications are clearly identified as coming from the relevant statistical service, and follow their respective standards.

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

Fully met

Comments: In the event of serious criticism, misuse or misinterpretation of official statistics, Insee can intervene in the debate in various ways, such as by issuing a press release or by responding to the relevant media report. The institute adopts a cautious approach, and such public engagement is relatively infrequent.

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: Insee and other statistical services in France have a strong legal basis for data collection. In the case of Insee, this is provided for in the decree of 1946 that gave Insee its mandate. Moreover, the fact that the annual statistical programme is approved by the CNIS, which has wide representation, and the fact that each survey is given the stamp of approval by the quality label committee, ensure that Insee's mandate for data collection is well accepted by the respondents' representatives.

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

Fully met

Comments: The mandate is provided for explicitly in Decree no 46-1432 of June 1946 (modified by the decree 89-373 of June 1989). Details are further elaborated elsewhere in the Act of 1951 on legal obligation, co-ordination and confidentiality in the field of statistics.

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

Fully met

Comments: Article 7bis of the law 51-711 of June 1951 (which was added to the 1951 law in 1984 and extended in August 2004) covers access to administrative data by Insee and the SSMs. In the case of business data, access requires the opinion of the CNIS and then a positive decision from the Minister for Finance and from any other

ministers involved. In the case of personal data, the approval of the CNIL (Commission Nationale de l'Informatique et des Libertés) must be also obtained (though Article 7bis imposes restrictions in the field of sexual life and there are special conditions on data related to health.) In practice, whenever a strong statistical case exists for access to administrative data, it tends to be supported by the CNIS or the CNIL as appropriate.

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

Fully met

Comments: A decision to make response to a particular survey obligatory can be made by the Minister on the basis of a positive opinion from the quality label committee. Obligatory response is more likely to be arranged for business surveys than for household surveys, although response to their census of population (which has been redesigned and is partly sample-based) is mandatory. In practice, Insee occasionally pursues businesses. Fines are decided by the Minister (not by the courts) on the basis of the opinion of the CNIS litigation subcommittee. The maximum level of fine is however extraordinarily low: Article 7 of the 1951 law stipulates that the maximum fine is €150 for the first offence, though subsequent fines can rise to €2,250 for each offence.

Principle 3: Adequacy of Resources

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

Overall assessment: The number and quality of staff are sufficient to meet European and national statistical requirements. Financial resources, while leaving some room for improvement, are adequate. Computing resources are adequate in quantity, though the capacity for taking on new developments could be improved. Overall no major problems exist.

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

Fully met

Comments: Staff resources are adequate in terms of number: Insee has about 6300 staff and the SSMs a further 3000. They are also adequate in terms of quality: 26% of Insee's staff are category A, equivalent to academic level, mostly graduates from Insee's schools ENSAE and ENSAI and profiting from extensive training

programmes. The budget is sufficient to cover current needs, and the recently introduced system LOLF (Loi Organique Relative aux Lois de Finances) allows multi-annual budgeting and a more autonomous project- and mission-oriented allocation of resources. Computing resources are adequate for ongoing business, but the level of support for new developments leaves room for improvement.

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: An awareness of quality together with a range of quality procedures are present to a high degree in Insee, though they do not use a fully integrated overall quality management system such as TQM. During 2006, a quality unit and a quality network were set up, and a quality action plan was developed which is now being implemented; these aim at systematising and generalising quality procedures across the organisation. The plan is sufficiently specific as regards actions and indicators (which also tie in with the staff remuneration system), but it cannot yet be considered an overall approach to quality.

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

Largely met

Comments: While assessments are not done explicitly in terms of the ESS quality components, the criteria used are very similar. The quality action plan contains an action for disseminating the ESS principles through Insee and the SSMs, and they have started implementing this action.

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

Fully met

Comments: The quality of statistical processes and products is monitored by the persons and units responsible. In addition the quality label committee of the CNIS assesses all new surveys, and on a rolling basis every five years monitors all existing surveys and administrative data intake from a technical point of view. However there is no overall, centrally managed framework of quality rules and procedures. For a majority of statistical outputs and particularly for the more important ones, a quality assessment ('fiche qualité') is available, from the producer's rather than the user's point of view. The quality action plan that began in mid-2006 aims at evaluating and improving quality, at both an overall level and for specific statistical areas. The plan is detailed, with precise actions, timings and indicators.

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.

Fully met

Comments: For all surveys, several instruments and procedures exist for systematically dealing with quality issues, such as the Insee Comité des Investissements, the CNIS quality label committee, and the guides and checklists for planning new regional surveys. For existing surveys, quality evaluations and improvement actions are conducted mainly on an ad hoc basis, using checklists and procedures that are specific to the statistical process and product.

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.

Largely met

Comments: The extensive documentation available is used mainly for internal purposes. This documentation includes detailed specifications of roles and responsibilities drawn up in the context of Insee's systematic mobility policy. The

controversy referred to under Indicator 1.1, in which the appearance of an unexpected bias in the Labour Force Survey played a part, appears to show that in some cases the documentation might not be systematic or comprehensive. A generic document containing quality guidelines remains to be drawn up, and also made known to the public.

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

Largely met

Comments: The Inspection Générale of Insee regularly reviews statistical processes and products. External reviews of statistical output are invited and are seen as a source of improvement. These include voluntary IMF ROSC (Reports on the Observance of Standards and Codes) reports from 2003 onwards, and an audit that included international benchmarking by the Inspection Générale of the Finance Ministry in 2004.

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 well protected by law, despite some national exceptions, and is solidly installed as a value of the organisation. There have been no reported cases of breach and so the penalties foreseen by the legislation have not been applied. The physical protection measures put in place are documented in detail, and it appears that they are well followed and are effective. The dual legal framework, involving a fundamentally different treatment of business and household data, results in a certain complexity and lack of homogeneity.

Indicator 5.1 Statistical confidentiality is guaranteed in law.

Fully met

Comments: In the case of survey data on households and individuals, the provisions are set out in Article 6 of the 1951 law: personal information cannot be released before a period of one hundred years after the carrying out of the census or survey has elapsed. The 1978 law on Informatics and liberties also applies, and the CNIL gives its opinion on any issue involving the use of personal data. In the case of survey data on businesses, the rules are also set out in Article 6: individual information “shall under no circumstances, except a decision of administrative authority [ie, the

Minister] taken upon the advice of the Committee for Statistical Confidentiality [part of the CNIS], be released by the depositary department before a period of thirty years after the carrying out of the census or survey has elapsed. This information shall, under no circumstances, be used for the purpose of fiscal investigations or economic repression.” In fact, releases under this provision apply, and have only ever applied, to statistical or research use, and the authorisation is delegated to the Director General of Insee. As to the administrative registers managed by Insee (the SIRENE business register, the register of persons, the electoral file), dissemination from these follow specific legislation. It should be noted that, based on an opinion in 1986 of the Committee for Statistical Confidentiality, Insee openly disseminate four specific variables that have been taken from administrative sources (these variables would have already been in the public domain), though at the request of a particular enterprise this will not be done. Another exception to statistical confidentiality may arise in the frame of a criminal investigation: an examining judge has the right to access any documents held by any administration, and no exception is made for questionnaires or other records held by the statistical authorities.

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

Partly met

Comments: Respect for professional secrecy by civil servants is written in law, and statistical confidentiality is clearly enshrined in the staff culture at Insee. This explains why there is at present no formal legal commitment or pledge that staff must sign, although such a commitment is signed by the Insee interviewers and by any contractors who work on confidential data. During the Code of Practice self-assessment, Insee already remarked on this and launched an action for a formal legal confidentiality awareness document that would be signed by staff when they are appointed.

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

Fully met

Comments: The law allows for penalties of up to a year in prison or a fine of up to €15,000. There have been no reported cases of breach.

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.

Largely met

Comments: For staff carrying out data collection in the regions, guidelines exist and regular training is provided. The rules are less systematic for staff involved in data production. Nevertheless, staff are well aware of all the issues related to statistical confidentiality. Some general information about confidentiality protection is published on the Insee website, though these do not amount to guidelines.

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

Fully met

Comments: There is a central IT security unit, and the physical and technical protection provisions are solid. These provisions cover in particular the mapping of staff accesses to statistical databases with their current functions. The security policy is detailed, and is the object of revision by the Inspection Générale. It should be noted that the processing of the administrative registers managed by Insee is not organisationally separate from the actual statistical processing.

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

Fully met

Comments: In the case of household data, only fully anonymised microdata is ever released to researchers. This is highly protective in the context of statistical confidentiality, although it limits the usefulness of the information,. In the case of enterprise data, contracts are signed with the researchers or legal entities having access to the data. Individual information from SIRENE may be routinely purchased from Insee by anyone.

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 very good compliance with this principle, and the users interviewed, including the media, regarded Insee and its products as

objective and non-partisan. However, a wider range of information on statistical methods and procedures needs to be made publicly available.

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

Fully met

Comments: There is a solid methodological basis for new developments. The quality label committee is considered guarantee for this objectivity. In addition, Insee's internal investment committee (Comité des Investissements) gives a recommendation on any new project on the basis of both technical soundness and cost efficiency. The media representatives interviewed did not perceive any lack of objectivity on the part of Insee.

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

Fully met

Comments: We found no evidence that there was political influence in the choice of sources or in the statistical methods used by Insee.

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

Fully met

Comments: Insee has a policy that encourages staff to report on any errors detected after publication. Actions required for correcting, analysing the cause, and publicising the results are decided at high level. The most recent example relates to the dwelling rents reference index — the indices of 2nd and 3rd quarters of 2005 were published with an error. As soon as this error was detected, Insee issued a press release indicating the error, put a notice on its Internet site, and published a corrigendum with the series of corrected indexes.

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

Largely met

Comments: While Insee has a very good range of documentation on its statistical operations, only some of this is published on its internet site. Some of the users interviewed commented on this shortage of methodological information. A plan is in place to achieve a full coverage of methods and procedures by the end of 2008, and also to ensure that this information is kept up to date. There are also plans to increase the amount of the information available in English.

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

Fully met

Comments: Insee provides a three-month release calendar covering their most important statistics. This calendar also includes key releases from the ministerial statistical services. For the less important outputs, the calendar gives an indicative date which is made precise one week before release.

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.

Largely met

Comments: There are very precise rules for pre-release to authorities and the press, although this policy is not fully documented on the Insee website. The rules are detailed in the SDDS information submitted to the IMF, though of course only for those indicators covered by that standard. The policy of pre-release to the press was recently reviewed and as a result the time interval was considerably reduced and now stands at 15 minutes before publication. Leaks under embargo occur occasionally, though this happens comparatively rarely. (No such leaks have originated in the official statistical system.) In the event of a leak, Insee contacts the person or organisation involved, though they feel that they cannot guarantee against any future similar situations. In the past, the availability of primary data to external users could be sometimes delayed, thus giving a comparative advantage to the researchers and analysts in Insee. This seems to have been corrected at present.

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

Fully met

Comments: As Insee's objectivity was stressed by all users interviewed, we concluded that there is no concern on this regard.

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: Insee has a very extensive and widely used range of dissemination products, both in printed form and on the web, and users acknowledged the high quality of Insee publications. The results presented on its website are comprehensive and free. It also clearly advertises its service for providing custom analyses at marginal cost. While the rules concerning researchers' access to household microdata are strict, researchers seemed happy with the current arrangements. There is now an acknowledged need to increase the range of metadata and other documentation on the website, and to enhance the site's user-friendliness. There is a useful portal, maintained by Insee, covering the full range of official statistics produced in France.

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

Fully met

Comments: Insee publications are of an extremely high quality and are well appreciated by users. The organisation makes a special effort to communicate effectively with the press and other user categories. Insee have also developed a useful web portal to all official statistics in France.

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

Fully met

Comments: The move to make all data available on the internet has been highly appreciated by users. It has opened statistical information more widely to society and greatly reduced the access cost. It has also resulted in a higher pressure to increase the

range of documentation available and a greater need to improve the user-friendliness of the site. Insee is aware of this and it plans specific actions to cover these two areas.

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

Fully met

Comments: The Insee website explains the options for obtaining custom-designed analyses. Such work is done on a marginal cost recovery basis. When deemed convenient, Insee makes publicly available the results of such analyses.

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

Fully met

Comments: This indicator is also included in Principle 6, but in the context of Principle 15 it is intended to reflect rather the utility of data for users, while still respecting the strict rules of confidentiality. Although these rules seemed to us to be rather restrictive in the case of household data, the representatives of the research community expressed their satisfaction with the current arrangements.

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

Largely met

Comments: The standard followed by Insee is their own DDS (Dispositif de Documentation Structurée) standard, which we were informed is generally in accordance with current standardised metadata systems. However, the metadata presented on the Insee website is not complete.

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.

Largely met

Comments: The procedure for documenting methods and quality broadly follows the ESS criteria, but the extent to which users are informed of these is rather limited at present. Insee intend to address these issues in the context of the quality action plan it launched in 2006.

4. COORDINATION ROLE OF THE NATIONAL STATISTICAL INSTITUTE

The official statistical system in France is complex yet coherent. Despite its very high degree of both functional and geographic decentralisation, it is clear that the system is strongly coordinated, both institutionally and technically. The main features of this coordination are summarised below.

The key coordination role in the French system of official statistics is filled by the National Council for Statistical Information (CNIS), an organisation with an extremely broad mandate and with widespread representation (over 100 members), and which acts as a forum for dialogue between producers, users and other stakeholders. While the CNIS has no decision-making powers, its influence is such that its advice carries a lot of weight and is almost invariably followed. The Council coordinates the work programmes of Insee and the other services that make up the statistical system and, as part of that process, it publishes an annual programme covering all surveys planned for the year. It also supports the use of administrative records for statistical purposes, and works to coordinate data needs.

Much of the work of the CNIS is done by its subcommittees. For any new survey to proceed, it must undergo a process of intensive scrutiny: it must first get a positive opinion on its usefulness and relevance from a CNIS task force that specialises in the relevant area, and then it must be awarded a stamp of approval from the quality label committee (Comité du Label, another subcommittee of the CNIS). The quality label committee also makes a recommendation on whether response to the survey should be mandatory, and if so what the deadline should be for response. The litigation committee recommends individual action for refusals to respond to compulsory surveys. The Confidentiality Committee monitors the enforcement of confidentiality rules for business data, and may authorise transmission of individual data to official statisticians or to researchers. Finally, another subcommittee of the CNIS, the national commission for economic and social classifications (CNNES) has an advisory role in relation to all official economic and social classifications used.

As the main producer of official statistics, Insee itself plays an important role in coordinating concepts, surveys, techniques, methods and nomenclatures. It coordinates the work of the ministerial statistical services (SSMs), acts as secretariat for the CNIS and its subcommittees, manages the registers of individuals and enterprises, maintains the online portal to official statistics (www.statistique-publique.fr, which gives access to statistics released by Insee and all the SSMs), and it represents the French official statistics system internationally.

Insee also has the central responsibility in the official statistical system for training and career-development. The schools ENSAE (beside Insee's HQ in Paris) and ENSAI (in Brittany), which are both part of Insee's structure, provide specialist training for future higher-level management personnel in Insee and the SSMs. The senior employees (Category A) of Insee comprise Administrateurs (3 years at ENSAE) and Attachés (2 years at ENSAI). Many of their staff will therefore have received common training in management, statistical techniques, economics, and in IT tools and technologies. Insee also implements a systematic mobility policy across the official statistical service, which ensures a high level of mobility between Insee and the SSMs, and between Insee and its regional directorates. This is a powerful coordination tool and helps to ensure a uniform statistical culture and competence across the whole system.

The regional services are part of Insee (and indeed they contain the majority of Insee's staff), although they liaise with their corresponding authorities to cater for specific statistical demands. As mentioned under Indicator 1.1, a decree has granted them statistical independence at regional level. To ensure coordination, the heads of the regional services meet six times a year.

5. GOOD PRACTICES TO BE HIGHLIGHTED

The French statistical system benefits from an impressive mobility policy managed by a dedicated unit in Insee. The main principle is that staff moves about every four years. Mobility is organised on a yearly basis by publishing the extensive list of Insee and SSM posts, including regional posts, involved in the changes, with each entry containing detailed information on the post involved. The policy helps share skills and best practices, improves professionalism, and results in a high staff loyalty, and this in turn enhances the reputation of Insee and the ministerial offices, both from technological and deontological points of view.

The RESANE (Refonte des Statistiques ANnuelles d'Entreprises) project, which involves a radical redesign of the system of structural business statistics, is striking in its scale and ambition. It will result in a single register with all enterprises, local units, enterprise groups and subgroups, and with ownership links between them. It focuses on three main areas:

- Greater use of administrative sources: The use of annual enterprise surveys will virtually cease, with most of the required data being collected from relevant administrative sources.
- Major process re-engineering: RESANE plans to merge many existing cumbersome processes into one efficient unified process. Currently, a range of sources is treated independently, and this will change to a consolidated system with each enterprise being treated only once.
- Coverage of enterprise groups: RESANE will allow the enterprise group to become a major observation unit for economic statistics.

When implemented, RESANE should offer very considerable benefits: a sizeable reduction in the burden on respondents, improved coherence and quality, a timelier publication of survey results, considerable productivity gains, and a better coverage of the role of enterprise groups in the economy. It is expected that the new system will be operational in early 2009 in respect of the year 2008.

As mentioned earlier, Insee has developed and maintains a web portal that gives access to the official statistics released by Insee and the SSMs. For users, the portal provides a convenient, harmonised access and search facility to an impressively wide range of data from diverse sources. Insee plans to extend it to cover other data producers.

6. RECOMMENDATIONS OF THE PEER REVIEW TEAM

1. As indicated under Principle 1, we believe that Insee compiles and disseminates its statistics in an independent manner without political interference, despite the fact that, in contrast to the general situation of other national statistical institutes in the European Statistical System, it does not have a legal basis to this independence. However, the intense controversy on the unemployment figures, which was widely covered in all the media in France while this review was taking place, showed clearly the damage that can be caused when there is the perception, in some minds at least, that a statistical institute is influenced by political considerations. Accordingly, it can come as no surprise that we strongly recommend that Insee be accorded this independence as soon as practicable. As mentioned under Indicator 1.1, Insee have already proposed a draft decree in this regard, though of course any decision on this, including its timing, is a matter for the legislators rather than Insee.
2. An unusual aspect of Insee's role, referred to under Principle 1, is its management of administrative registers, and the fact that these register-management activities are integrated with its statistical activities. Given the occasional strong criticism in the media in relation to proposals to extend the use of the personal identification number, created for social purposes, to other areas, and the potential damage that this could cause to Insee's credibility, we recommend examining the feasibility of establishing some degree of separation between Insee's statistical activities and its administrative activities.
3. Insee has decided on an improvement action to extend the current quality reporting to the full range of business statistics. We recommend that, when this has been completed, the quality reporting should be further extended to cover all household surveys.
4. There is an asymmetry, arising from Article 6 of the 1951 law, in the treatment of business microdata and personal/household microdata. We recommend that this asymmetry be examined and that there should be an analysis of the possibility of changing the legal situation, given that the 1978 law (creating the CNIL) stipulates rules to be followed for the use of personal data which go beyond statistical purposes. Moreover, the feasibility of creating of a safe centre on Insee premises for access to personal microdata should be investigated.
5. For staff involved in the processing and disseminating of data, there are instructions concerning statistical confidentiality, and staff are well aware of all the issues involved. However, there is no single document explaining the general standard rules and procedures that are followed by Insee. We recommend that such a set of guidelines be produced and made available on the Insee website.
6. We recommend that Insee's policy of pre-release to authorities and the press be generalised and made more readily accessible on the Insee website.

7. LIST OF IMPROVEMENT ACTIONS BY PRINCIPLE OF THE CODE

Principle 1: Professional Independence Improvement actions Enshrine in law the principle that Insee and the SSMs are independent in statistical matters	Timetable No timescale
Principle 2: Mandate for Data Collection Improvement actions None	Timetable
Principle 3: Adequacy of Resources Improvement actions None	Timetable
Principle 4: Quality commitment Improvement actions Extend the current quality reporting to the full range of business statistics	Timetable 2011
Draw up and promulgate quality guidelines and make them available on the Insee website	2008
Principle 5: Statistical Confidentiality Improvement actions Implementation of a legal confidentiality awareness signature by staff on appointment; a person joining the statistical authority will acknowledge having been informed that the law imposes the obligation on him or her to respect statistical confidentiality	Timetable 2008
Dissemination of a handbook about statistical confidentiality in production of statistics	2008
Principle 6: Impartiality and objectivity Improvement actions Extension of the coverage of metadata on the Insee website; this will be done by considerably extending the coverage of definitions and of sources and methods	Timetable 2009
Principle 7: Sound Methodology Improvement actions Processing of non-responses in the personal estate survey (l'Enquête Patrimoine)	Timetable 2008
Principle 8: Appropriate Statistical Procedures Improvement actions Extension of the CORE (Cadre Organisationnel pour la Réalisation des Enquêtes) project management model to all	Timetable 2009

Principle 8: Appropriate Statistical Procedures Improvement actions new household surveys	Timetable
Principle 9: Non-excessive burden on respondents Improvement actions Implement RESANE, the new system for structural business statistics; the first phase (shorter deadlines and reduced costs) will go into production in 2009, and the second phase (enterprise groups) in 2010-2011.	Timetable 2010-2012
Principle 10: Cost Effectiveness Improvement actions Census data collection by Internet	Timetable 2009-2011
Principle 11: Relevance Improvement actions Implementation of user satisfaction surveys	Timetable 2007
Principle 12: Accuracy and Reliability Improvement actions Measuring quality in the Dwelling Register (Census)	Timetable 2007
Principle 13: Timeliness and Punctuality Improvement actions None	Timetable
Principle 14: Coherence and Comparability Improvement actions Profiling business statistics	Timetable 2007
Principle 15: Accessibility and clarity Improvement actions Enhance the user-friendliness of the Website Extension of the coverage of metadata in the Website (see Principle 6)	Timetable 2008

8. ANNEX A: PROGRAMME OF THE VISIT

Wednesday, 24 January 2007

	Subject	Participants
09.30-09.45	Welcome and introduction of the programme	J-M Charpin, M Hébert, Ph Cuneo, J-L Lhéritier, C Madinier
09.45-11.15	Meeting with management on Principles 1, 6, and 15	J-M Charpin, M Hébert, Ph Cuneo, J-L Lhéritier, J-P Le Gléau, P Audibert, M Blanc
11.15-12.00	Meeting with management on Principles 2 and 3	O Perrault, G Bourgey, Ph Cuneo, J-P Le Gléau, M Hébert
12.00-12.45	Meeting with management on Principle 4	J-M Charpin, M Hébert, Ph Cuneo, C Madinier, J-P Grandjean, M Moutardier, D Verger, Ph Brion, J-P Bernard, M-F Bobin
12.45-13.45	Lunch break	
13.45-14.45	Meeting with management on Principle 5	Ph Cuneo, J-P Le Gléau, G Pougetoux
14.45-15.45	Meeting with young statisticians of Insee	J Khélif, E Delame, J Duval, F Minodier, S Skrabo, A Degorre
15.45-17.00	Meeting with INSEE regional offices management	M Hébert, S Marchand, P Muller, E Traynard, J-J Malpot, Ph Cuneo
17.00-17.30	Meeting with business statistics management on the RESANE project	J-M Béguin, E Raulin, R Depoutot, Ph Cuneo

Thursday, 25 January 2007

09.30-10.45	Meeting with the heads of SSMs	Ph Cuneo, J-P Le Gléau, V Madelin, B Trégouët, Y Robin, C Lefebvre
10.45-11.30	Meeting with direct stakeholders: Bank of France, DGTPE (Treasury), government accounts Directorate General	Ph Cuneo, A Chappert, F Lenglard, S Duchêne, J Cordier, G Houriez
11.30-12.30	Meeting with the media	C Colin, S Grosdidier, C Kagan, C Madinier, several journalists
12.30-14.00	Lunch break	
14.00-15.00	Meeting with users: board of the CNIS	Ph Cuneo, J-P Le Gléau, J-P Duport, J-P Bompard, Y Renard

15.00-16.00	Meeting with users: diverse members of the National Council for Statistical Information (CNIS): such as representatives from university, elected representatives, etc	Ph Cuneo, J-P Le Gléau, R Silberman, J Maurice, J Freyssinet
16.00-16.45	Meeting with the quality label committee	Ph Cuneo, J-P Le Gléau, C Terrier, J Garagnon, B Boulengier, J Bossi
16.45-17.45	More thorough investigation of certain subjects	Ph Cuneo, J-P Le Gléau, J-L Lhéritier, C Madinier

Friday, 26 January 2007

09.30-10.30	Meeting with management to sum-up and for a detailed review of the list of improvement actions for all principles	Ph Cuneo, J-L Lhéritier, C Madinier, J-P Le Gléau
10.30-12.30	Presentation of the conclusions and peer review draft report	Executive committee of INSEE, J-L Lhéritier, C Madinier, J-P Le Gléau

9. ANNEX B: LIST OF PARTICIPANTS

INSEE participants

Jean-Michel	CHARPIN	Director-general
Olivier	PERRAULT	Secretary-general
Pierre	AUDIBERT	Dissemination and regional action director
Jean-Marc	BEGUIN	Business statistics director
Jean-Patrick	BERNARD	Head of Insee Info Service Department
Michel	BLANC	Head of publications department
Marie-France	BOBIN	Deputy-Head of programming and management department
Guy	BOURGEY	Deputy-Head of programming and management department
Philippe	BRION	Head of harmonization for enterprise survey division
Alain	CHAPPERT	Economics studies and national accounts director
Christel	COLIN	Director general's office
Philippe	CUNEO	Statistical coordination and international relations director
Emmanuel	DELAME	Junior statistician
Arnaud	DEGORRE	Junior statistician
Jonathan	DUVAL	Junior statistician
Raoul	DEPOUTOT	Deputy-head of system of enterprise statistics department
Jacques	GARAGNON	Member of Inspectorate-General
Jean-Pierre	GRANDJEAN	Deputy-Secretary general- head of IT
Sabine	GROSDIDIER	Press relationship officer
Michel	HEBERT	Head of Inspectorate-General (internal audit service)
Claudine	KAGAN	Head of external communication division
Johara	KHELIF	Junior statistician
Jean-Pierre	LE GLEAU	Head of statistical coordination department
Fabrice	LENGLART	Head of national accounts department
Jean-Louis	LHERITIER	Head of Europe and multilateral relations unit
Stéfan	LOLLIVIER	Demographic and social statistics director
Chantal	MADINIER	Head of standards and information system unit
Jean-Jacques	MALPOT	Regional director
Sylvie	MARCHAND	Regional director
Frédéric	MINODIER	Junior statistician
Mireille	MOUTARDIER	Head of application division
Pierre	MULLER	Regional director
Gérard	POUGETOUX	Head of security system
Emmanuel	RAULIN	Head of system of enterprise statistics department

Carla	SAGLIETTI	CNIS Secretariat general
Sylvain	SKABO	Junior statistician
Christophe	TERRIER	CNIS Label committee
Etienne	TRAYNARD	Regional director
Daniel	VERGER	Head of statistical methods unit

Other participants

Jean-Pierre	BOMPARD	CFDT (a French Trade Union) representative at the CNIS
Jeanne	BOSSI	CNIL
Bernard	BOULENGIER	CNIS sub-committee chairman
Jean	CORDIER	Banque de France
Sandrine	DUCHENE	Head of Government finances sub-Directory at DGTPE
Jean-Pierre	DUPORT	CNIS vice-chairman
Jacques	FREYSSINET	Researcher, CNIS Working Group chairman
Guillaume	HOURIEZ	Head of Government account statistics
Claire	LEFEBVRE	Head of the Customs statistical office
Virginie	MADÉLIN	Head of the Ministerial statistical office of agriculture
Joel	MAURICE	Professor, CNIS sub-committee chairman
Yvonick	RENARD	MEDEF (employers confederation) representative at CNIS
Roxane	SILBERMANN	Researcher
Bruno	TREGOUET	Head of the Ministerial statistical office of environment