PEER REVIEW REPORT

ON COMPLIANCE WITH THE EUROPEAN STATISTICS CODE OF PRACTICE AND FURTHER IMPROVEMENT AND DEVELOPMENT OF THE NATIONAL STATISTICAL SYSTEM

FINLAND

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1. **EXECUTIVE SUMMARY**

The Finnish Statistical System and in particular Statistics Finland relies on an institutional environment rooted in the principles of the European Statistics Code of Practice (ES CoP). More specifically, the Statistics Act, the Statistics Finland Act and the Council of State Decree on Statistics Finland have granted Statistics Finland a strong legal mandate. It is planned that this legal environment will be reinforced further in the near future.

The professional independence (ES CoP Principle 1) of Statistics Finland and Other National Authorities developing, producing and disseminating European/official statistics is laid down in the Statistics Act. The qualification requirements and rules for the appointment of the Director General of Statistics Finland are laid down in the Council of State Decree on Statistics Finland. Statistics Finland’s professional independence is widely recognised and unchallenged, and Statistics Finland is recognised and valued as the coordinator of the national statistical system (ES CoP Principle 1bis). It has established a thoroughly elaborated development strategy for the entire Finnish statistical system.

Statistics Finland’s approach to statistical confidentiality and data protection (ES CoP Principle 5) is solid. Confidentiality is maintained according to the legal requirements. Regulatory, administrative, technical and organisational measures are in place to protect the security and integrity of statistical data and their transmission. Additionally, Statistics Finland has set up a risk management system.

Statistics Finland systematically pays attention to data interoperability and process efficiency (ES CoP Principles 9 and 10), enabled by a systematic and encompassing enterprise and business architecture approach, which oversees and guides the integration of statistical domains into larger data repositories. A data warehouse approach has been fully implemented for business statistics and is on track for population and environmental statistics.

Quality management and monitoring (ES CoP Principle 4) in Statistics Finland are implemented throughout the organisation. Moreover, it takes the lead in a nationwide approach to quality of public sector data.

Among the many innovative efforts of Statistics Finland, the most striking are made in the area of communication (ES CoP Principle 15). The grouping of statistics under wider phenomena and establishing a layer of phenomena experts, trained and capable of communicating through all kinds of media on these phenomena, is a noteworthy practice, which could possibly be applied in other National Statistical Institutes.

Overall, the peer review team found Statistics Finland to be in compliance with the ES CoP. Consequently, all recommendations mentioned below should be considered improvement-related.
RECOMMENDATIONS

I. Enhance coordination

The Finnish national statistical system is well-structured, including a dedicated body to promote the system’s coordination, and the coordinating role of Statistics Finland is defined in law. In practice however, Other National Authorities are consistently pointing out that a more proactive coordination would be welcome.

To improve beyond compliance with the ES CoP, the peer review team recommends:

1. **Statistics Finland should strengthen a proactive coordination of the Finnish statistical system by sharing good practices and providing methodological and other guidance, as well as tools, and by addressing Other National Authorities at the appropriate levels.** *(Improvement-related, ES CoP indicators 1bis.1 and 1bis.2)*

In the previous round of peer reviews, it was already recommended ‘to set up a well-branded web portal to all official statistics, including a single calendar covering all of Finland’s official statistics’. For technical reasons, this has not yet materialised. However, in the framework of the new website to become available soon, this will be possible.

To improve beyond compliance with the ES CoP, the peer review team recommends:

2. **Statistics Finland should publish a common release calendar covering at least all European statistics.** *(Improvement-related, ES CoP, indicators 1bis.1, 6.5 and 13.4)*

Statistics Finland has ensured that standard concepts, definitions and classifications are consistently applied in-house and documented in an internal meta-database as well as published on its website. Quality reports for all statistics are compiled in an internal application and will be published on Statistics Finland’s new website.

However, some Other National Authorities still publish metadata and classifications in different formats on their websites. The peer review team was informed that they are willing to work towards a solution on this issue.

To improve beyond compliance with the ES CoP, the peer review team recommends:

3. **Statistics Finland should engage in a continuous dialogue with Other National Authorities on achieving a harmonised approach to metadata, including classifications.** *(Improvement-related, ES CoP, indicators 1bis.2, 7.2 and 15.5)*

In some of the reviewed Other National Authorities, the Statistics Functions are scattered over the organisation as a whole. This could potentially lead to a blurring of the border between the statistical role and other roles, such as policy-related roles.

To improve beyond compliance with the ES CoP, the peer review team recommends:

4. **The Finnish Immigration Service and the Institute for Health and Welfare should clearly delineate the statistics function within their organisations; the rules and organisational structure should be such that a clear distinction can be made between their role in statistics and the other roles they perform.** *(Improvement-related, ES CoP, indicator 1.3)*
II. Ensure adequate financial and human resources

While, in principle, Statistics Finland is sufficiently funded and staffed to fulfil its current European and national tasks, it cannot ensure that its ambitions towards users and in the field of innovation will be achieved in the coming years as set out in its strategy. The peer review team found that Statistics Finland’s management has set a far-reaching target of becoming the central data source for all types of users in the country. Some elements of this objective could be reached through efficiency gains and reallocation of resources but for others, additional financial and human resources will be necessary. This is especially the case for IT, whose budget was substantially cut in the previous years, while the need for IT-based data services is exponentially growing.

To improve beyond compliance with the ES CoP, the peer review team recommends:

5. Statistics Finland should take initiatives to reinforce its financial and human resources and to ensure their sustainability. Special attention should be paid to IT human and financial resources, as these are central for innovation, efficiency and modernisation. (Improvement-related, ES CoP, indicators 3.1 and 10.2)

Linked to the previous recommendation, the peer review team was informed that workload and budget limitations hamper participation in training and scientific exchanges beyond a collaboration with selected Nordic countries. At the same time, the turnover of staff has increased. This poses a risk in terms of Statistics Finland’s ability to sustain its path towards modernisation, innovation and continuous improvements, given the importance of peer exchanges and knowledge transfer for staff skills and motivation.

To improve beyond compliance with the ES CoP, the peer review team recommends:

6. Statistics Finland should systematically increase the exposure of its staff to training and scientific exchanges, going beyond the Nordic collaboration and including those offered by the European Statistical System. (Improvement-related, ES CoP, indicators 7.6 and 7.7)

III. Extend involvement in changes in administrative data and increase the use of other data

Statistics Finland has comprehensive access to a wide range of administrative data and has built a system that depends on their sustainable availability in terms of content, access modalities, frequency, etc. Thus, any changes in the administrative data may pose a potential risk for data production and quality. While collaboration seems to function well on a bilateral and informal basis, more structured and guaranteed involvement in decision-making on administrative data, including foreseen modifications, seems to be lacking.

To improve beyond compliance with the ES CoP, the peer review team recommends:

7. Statistics Finland and those authorities providing data to Statistics Finland should ensure that appropriate mechanisms are in place to ensure that Statistics Finland is involved at an early stage when administrative data systems are being developed or reviewed so that the needs of official statistics are taken into account. (Improvement-related, ES CoP, indicator 2.2)

Due to the pressing needs in the field of asylum and migration policy, changes in administrative procedures can be rather frequent. This is a potential threat to the continuity of statistics on asylum and migration. In order to mitigate this risk, statisticians should be involved in the decision-making process.
To improve beyond compliance with the ES CoP, the peer review team recommends:

8. The Statistics Function in the Finnish Immigration Service should be involved in the decision-making process that could induce changes in administrative procedures. (Improvement-related, ES CoP, indicator 2.2)

Privately held data are rapidly becoming a potential means for enriching statistics and creating new products. However, it is still unclear, including in Finland, how access to such data for statistical purposes could be guaranteed.

To improve beyond compliance with the ES CoP, the peer review team recommends:

9. Statistics Finland and the Finnish Government should ensure that appropriate legal and/or other mechanisms are in place to grant Statistics Finland the authority to use privately held data. (Improvement-related, ES CoP, indicator 2.4)

Since the introduction of mobile telephony, linking telephone numbers to persons for data collection purposes has become very difficult. However, certain public authorities hold registers of such numbers and other contact information of these persons for administrative purposes. An appropriate legal or other mechanism could ensure the use of these registers for official statistics.

To improve beyond compliance with the ES CoP, the peer review team recommends:

10. Statistics Finland, the Finnish Government and national authorities holding contact data should ensure that appropriate legal and/or other mechanisms are in place to grant Statistics Finland access to contact information obtained from other public authorities, including mobile telephone numbers, email addresses and fixed line numbers for data collection purposes, in order to increase response rates. (Improvement-related, ES CoP, indicator 2.2)

IV. Strengthen user orientation

The newly created statistical programme is an overarching tool to steer the production of European statistics by Statistics Finland and Other National Authorities. Its role could be enhanced to become a vehicle for a more formalised user-producer-dialogue on a regular basis and at a sufficiently high level. Such a dialogue could complement existing internal and external consultation structures, such as the Advisory Board on Official Statistics, where mainly producers of official statistics are represented, and dedicated working groups with rather specialised users.

To improve beyond compliance with the ES CoP, the peer review team recommends:

11. Statistics Finland should set up a more systematic process of stakeholder consultations during the preparation of the statistical programme. This would allow a broader societal dialogue on evolving user needs, bridging the current gap between the involvement of very few external stakeholders via the Advisory Board on Official Statistics and consultations of specialised users via working groups. (Improvement-related, ES CoP, indicators 11.1 and 11.2)

Statistics Finland’s data warehouse approach is already well-developed and will allow for future-proof solutions for data integration, to derive new products more quickly in an agile manner. Users already benefit from tailor-made tabulations and broad access to microdata. However, while experienced regular users of the website (lead journalists, scientists) are familiar with the rather sophisticated access solutions and opportunities, less frequent or specialised users may experience difficulties
already at the stage of discovering what kind of information could possibly be available and how to access it.

To improve beyond compliance with the ES CoP, the peer review team recommends:

12. **Statistics Finland should provide more guidance to various user profiles on the wealth of information available, in order to help them navigate through the database and make what is available more explicit. (Improvement-related, ES CoP, indicators 15.1 and 15.2)**

Statistics Finland has a well-organised system for accessing microdata for research purposes. However, if users need microdata from different sources, they sometimes have to apply through different channels. Also, procedures are rather slow and access is expensive, while the offered memory capacity is sometimes considered insufficient. The peer review team is aware that supplying microdata is also a source of income. However, a balance should be struck between user orientation and commercial aspects.

To improve beyond compliance with the ES CoP, the peer review team recommends:

13. **Statistics Finland, in collaboration with relevant Other National Authorities, should aim at a more uniform access to microdata throughout the entire statistical system. At the same time, Statistics Finland should aim at accelerating access to microdata for research purposes and a more user-friendly cost policy. (Improvement-related, ES CoP, indicators 1bis.1 and 15.4)**

The National Resources Institute, as an ONA, produces high-quality agricultural, forestry and fishery statistics. However, as the National Resources Institute was formed by merging several institutions, it still has different IT solutions, databases and methods for data collection and analysis.

While the National Resources Institute publishes its statistical information on its website in textual form (along with statistical tables and graphs), quality reports are not yet published following the Single Integrated Metadata Standard 2.0 structure, the release calendar could be improved and guidelines and instructions could be available in more languages.

To improve beyond compliance with the ES CoP, the peer review team recommends:

14. **The National Resources Institute, as an Other National Authority, should use its full ICT potential (through standardisation and automation) to deliver more user-friendly and modern services. It should also improve and extend the publicly available information on its website (including its revision policy and quality reports) and make it available in English. (Improvement-related, ES CoP, indicators 10.2, 15.2 and 15.7)**

In the spirit of continuous improvement integral to the European Statistical System (ESS), the NSI will interpret the recommendations formulated in this report into improvement actions for implementation within the national statistical system (NSS).
2. INTRODUCTION

It is recognised that quality is one of the comparative advantages of the European Statistical System’s (ESS) in a world experiencing a growing trend of instant information and new challenges, driven by exceptional circumstances or the continuous need for faster but quality-assured data. The European Statistics Code of Practice (ES CoP) is the cornerstone of the ESS common quality framework, and the ESS statistical authorities have committed themselves to adhere to it.

In this context, it is crucial for the ESS to be equipped with a review mechanism, the peer reviews, supporting with credible evidence this self-commitment to adhere to the ES CoP. The objective of this review mechanism is to enhance the integrity, professional independence and accountability of the ESS statistical authorities. The first round of peer reviews was carried out in 2006-2008, followed by a second round in 2013-2015.

In 2017, the ES CoP was reviewed and extended and now encompasses 16 principles. This revised version of the ES CoP triggered a third round of peer reviews, being carried out in the Member States of the European Union and of the European Free Trade Association (EFTA) and Eurostat, from 2021 to mid-2023. This round of peer reviews aims to improve the quality and trust in European statistics by assessing the compliance of the ESS with the principles of the revised ES CoP. The peer reviews cover the ESS statistical authorities (Eurostat, the National Statistical Institutes (NSIs) and selected Other National Authorities (ONAs)) developing, producing and disseminating European statistics. The peer reviews will be followed by a period of annual monitoring of the implementation of the improvement actions developed by the NSIs to address the recommendations laid down in the peer review reports.

The third round of peer reviews has the following two objectives:

- To review the compliance/alignment of the ESS with the ES CoP, in order to demonstrate to the ESS and to external stakeholders that the ESS is a system based on the principles of the ES CoP;
- To help NSIs, ONAs and Eurostat in their further improvement and development by indicating future-oriented recommendations; at the same time they should stimulate government authorities to support the implementation of these recommendations.

Each peer review is conducted by a team of four statistical experts (both from inside and outside the ESS). The peer review has four phases: completion of the Self-Assessment Questionnaires (SAQs) by a country; analysis of these SAQs by the peer review team; a country visit by the peer review team; and the preparation of the final report and ensuing recommendations by the peer review team. These recommendations are of two types:

- Compliance relevant (ensuring compliance/alignment with the ES CoP);
- Improvement related (less critical/technical supporting improvements).

A combination of an audit-like and a peer review approach is used when assessing the national statistical systems (NSS) in the countries to benefit from the positive aspects of both approaches. The audit-like approach requires the provision of documents as evidence, the ownership of the recommendations by the peer review expert team, and the right for the NSIs to express diverging views on the recommendations and to formulate the corresponding improvement actions. Whereas the peer review approach allows for common agreement within the ESS on the methodology, objectives, scope and implementation arrangements, the focus on improvements and a peer learning process.
Although all principles of the ES CoP will be reviewed for all countries through the SAQ, the peer review experts are free to customise the country visit to concentrate on those principles where more clarification/explanation is needed. However, certain principles such as those concerning professional independence and coordination and cooperation, as well as principles including elements of modernisation, will be assessed during the peer review visit for every member of the ESS.

In addition to the principles concerning professional independence (principle 1) and coordination and cooperation (principle 1bis), as well as principles including elements of modernisation (principles 2, 4, 7, 8, 15), the peer review of Finland focused on certain aspects of principle 3 (Adequacy of Resources), since it was pointed out that Statistics Finland and certain ONAs face challenges in human resources and the allocation of funding, and on user orientation (principles 6, 11 and 15), since users and stakeholders drew the attention of the peer review team on the room for improvement in this respect.

Also, although the reports should not be used to compare one country to another, much effort has been made to ensure the harmonisation of the reports and the ensuing recommendations across the countries so that all countries are treated equitably.

The peer review of Eurostat was conducted by the European Statistical Governance Advisory Board (ESGAB).
3. BRIEF DESCRIPTION OF THE NATIONAL STATISTICAL SYSTEM

The Finnish Statistical System and Statistical Act

The Statistics Act (280/2004) mandates four statistical authorities, namely Statistics Finland, The Natural Resources Institute Finland, the National Institute for Health and Welfare and the Finnish Customs to collect, process and disseminate data for statistical purposes. The Statistics Finland Act (48/1992 and 901/2002) and the Council of State Decree (1063/2002) on Statistics Finland guide the activities of Statistics Finland. The Statistics Finland Act provides for Statistics Finland to develop official statistics in collaboration with other central government authorities. The National Statistical System comprises - in addition to the four statistical authorities mentioned above - nine other organisations, which are mostly government agencies and of which 11 produce Official Statistics of Finland. Official Statistics of Finland (OSF) are a collection of statistics describing society. They comprise around 250 sets of statistics. The production of OSF must be continuous and of high quality, and the producer of the statistics must commit to quality criteria. The Advisory Board of Official Statistics of Finland grants the OSF stamp.

All in all, six of these authorities have been designated Other National Authorities (ONAs) taking part in the ESS: the Natural Resources Institute Finland (LUKE), the Finnish Immigration Service (MIGRI), the National Institute for Health and Welfare (THL), the Finnish Institute of Occupational Health (TTL), Finnish Customs (TULLI), and the Finnish Environment Institute (SYKE). Four of these were selected to participate in the peer review based on their share for 2020 (97%) in the total number of transmissions and their share (99.9%) in the total data volume of European statistics sent by Finland to Eurostat.

Appointment and dismissal of the Head of NSI

The appointment procedure for the Director General of Statistics Finland (Head of NSI) is based on the Public Servants Act, Section 3. The requirements for the post are set out in the Council of State Decree on Statistics Finland. The qualification requirements are a higher-level academic degree, management skills and management experience proven in practice as well as the broad-based experience required by the position. The Director General is appointed by the Council of State.

The term of the Director General has been defined as 5 years. A civil servant may be dismissed for a reason attributable to the civil servant him/herself, but only if the reason is especially weighty. The reason cannot be his/her political or religious opinion, illness or participation in a legal strike.

Statistical Programming

Since December 2020, the statistical programme brings together the statistics of Statistics Finland and other producers of Finnish official statistics. The programme also presents the key development activities of statistics over the next few years, as well as the services provided.

Finland’s statistical programme is aligned with European priorities and is used for the internal planning, monitoring and development purposes of Statistics Finland. It is published on its website yearly, along with the performance agreement, the annual release calendar and the annual performance reports.
Coordinating body

Statistics Finland coordinates the activities of the national statistical system (NSS) through the Advisory Board for Official Statistics. The Advisory Board acts as a joint forum for authorities producing official statistics in order to advance the development policies of official statistics and the objectives of the national level coordination of the European Statistical System. All producers of official statistics are members of this board. Its appointment and tasks are defined in the Council of State Decree on Statistics Finland.

Access to data

The Statistics Act provides Statistics Finland with far-reaching access to data necessary for the production of official statistics from state authorities and agencies.

Human and financial resources

In 2020, Statistics Finland had 843 employees, 85% of which had tertiary qualifications. The annual budget amounted to 97.3 M€, slowly decreasing. Statistics Finland is exploring opportunities to produce more chargeable services.

Dissemination

According to the Statistics Act, Section 11, statistics shall be published as soon as possible after their completion. The main principle is that statistics are published to all users at the same time. The release calendar lists in advance all the statistical data and publications to be released over the year. The annual release calendar and the actual daily release times are set independently by Statistics Finland.

The reviewed ONAs

National Institute for Health and Welfare (THL)

The National Institute for Health and Welfare (THL) is one of the four statistical authorities in Finland. The Act on the National Institute for Health and Welfare (668/2008) provides the Institute with extensive authority to collect, utilise and publish statistical data. The legislation also guarantees THL extensive decision-making power to define the collected data and published statistics. The Institute is responsible for three European statistics: social protection expenditure and financing (European System of Integrated Social Protection Statistics ESSPROS), Health Expenditure and Financing (System of Health Accounts SHA2011) and the European Health Interview Survey (EHIS), which is carried out as part of the national FinSote health survey. In future, the Institute will also be responsible for producing non-expenditure health care statistics. The statistics function within THL is scattered across the organisation, with several departments collecting and processing statistical information for (national) statistical purposes. The management of the Information Services department has a coordination role.

Finnish Customs (TULLI)

Finnish Customs (TULLI) is a member of Official Statistics of Finland (OSF). Section 2 of the Statistics Act (280/2004) lists TULLI as a statistical authority in national statistics, while the Finnish Customs Administration Act (960/2012) also explicitly states that Customs takes care of international trade statistics and other statistics related to its industry. Article 52 of the Customs Act (204/2016) also entitles TULLI to carry out all the formalities to be applied (in customs clearance) and the data to be collected for producing international trade statistics, procedures to be followed and the time limits for such data collection.
TULLI is one of the larger institutions in official statistics, having a dedicated statistical unit with more than 20 employees, which is led by the Director of Statistics. The statistical unit is independently and entirely responsible for the operation of the Intrastat data collection and the production of trade of goods statistics in relation to third countries. TULLI operates its own trade of goods statistics database (ULJAS) using the common international classification standards. It also produces other publications and data releases.

**Natural Resources Institute Finland (LUKE)**

The Natural Resources Institute Finland (LUKE) serves as one of Finland’s four statistical authorities. LUKE itself is a large scientific institution and LUKE’s statistical unit and research units collaborate closely. LUKE produces Finland’s statistics on food and natural resources:

- The structure of agriculture, production methods and inputs, agricultural, horticultural and livestock production, environmental effects of production, and the prices of agricultural products;
- The commercial exploitation of forests, timber trade and markets, forest management and forest protection;
- Fishing, aquaculture, fisheries and fishing product marketing;
- Food safety and the balance sheet for food commodities.

The unit responsible for statistics is organisationally separated from other tasks. This provision is ensured by the Act on the Natural Resources Institute Finland (561/2014). The decision-making power of the director of statistics is described in LUKE’s Rules of Procedure and the Municipal Rules of Finance, according to which the director of statistics has sole responsibility concerning decisions on statistical methods, standards and procedures, timing and content of statistical releases.

**Finnish Immigration Service (MIGRI)**

The Finnish Immigration Service is a producer of European statistics. It produces statistics on immigration, asylum, the enforcement of immigration legislation and statistics on the Dublin procedure in the domain of Asylum and Managed Migration. MIGRI is a member of the National Coordination Group on Immigration Statistics organised by Statistics Finland. However, it does not produce Official Statistics of Finland.

MIGRI has a specific section named Statistics Services that is part of MIGRI’s Department of Finance. This section manages and coordinates all statistical processes and is responsible for maintaining and developing the reporting infrastructure. European statistics are compiled using the same reporting facilities used for reporting on MIGRI’s operations to policy makers. The section is also a national information provider to the general public as well as to officials in ministries.

The Technology and Digitalisation unit has the main responsibility for maintaining and developing the UMA register from which the statistics are extracted.

The production of European statistics is separated from the production of national official statistics, since some of the classifications, requirements and timetables differ.
4. PROGRESS/ADVANCEMENT IN THE LAST FIVE YEARS

Towards a stronger statistical act

Statistics Finland and the Other National Authorities developing, producing and disseminating official statistics (ONAs) enjoy a high level of professional independence and a strong legal mandate to collect data to be used for official statistics. Although attempts were made to revise the existing legal act based on the previous peer review recommendations more thoroughly, especially in the context of improved access to administrative and privately held data, the current Statistics Act (280/2004) has only been partly amended since then. These amendments clarified the definition and mandate of statistical authorities and strengthened the protection of private and personal data, based on the current GDPR provisions that have entered into force. However, the legal provisions still do not offer clear solutions to several issues, such as a more detailed definition of professional independence and rules for advanced information services beyond needs for official statistical purposes. A more fundamental amendment of the Statistical Act is planned to be on the Statistics Finland agenda at the beginning of 2022.

Access to administrative data, improvements in data integration

An exceptionally large array of administrative registers exists in Finland, which enables Statistics Finland to rely highly on their content when producing statistics. Some registers, such as the business, the causes of death and the land register provide very timely information. When the COVID-19 crisis broke out in 2020, Statistics Finland was able to offer useful, accurate and timely information based on these registers. Statistics Finland increasingly used new administrative data, such as the established register of incomes, and successfully tested the use of other data sources. Statistics Finland cooperates with the holders of such data more intensively, and when new data sources/registers emerged over the past few years, Statistics Finland’s opinion was often taken into account. However, this kind of cooperation still remains on a somewhat ad hoc level rather than applying a systematic approach to the use of new data sources for the purpose of official statistics.

The next level of business statistics integration was successfully achieved, with significant progress in implementing the Integrated Production System for Business Statistics (YTY). The GSBPM-based system integrates information from several data collections and administrative data sources. It is used very successfully as a GSBPM-based production tool and as a production system for preparing interlinked business data, assisting national accounts and other subject matter areas in producing coherent data. It also enables tailor-made tabular data queries from multiple sources for external customers. The system’s core advantage is its highly standardised production process and enhanced coherence of business statistics data. At the same time, the harmonised geocoding of statistical units has also introduced a new layer of possibilities for analysis.

Enterprise architecture and systematic approach to quality

There has been a significant structural development in Statistics Finland’s production process. Quality management as a horizontal tool is now applied at all the different service areas (departments) in the office throughout the entire production process. An enterprise architecture model helps the process owners to identify gaps in the different production stages. Monitoring and reporting on quality indicators as well as customer satisfaction surveys became embedded in the system. Owners of the statistics (survey managers) in Statistics Finland implement their internal quality audits based on common standards, methodologies and tools and use a standard list of key performance indicators for evaluation and publication.
From an overarching data quality perspective at national level, Statistics Finland leads the ‘Data Quality Framework Project’ in collaboration with nine administrative agencies. Being part of the project on opening up and using public data (under the responsibility of the Ministry of Finance), this project aims at increasing the usability and uniformity of public sector data and extending the use of these data for decision-making in society and by enterprises. Evidently, final data quality largely depends on the content of the source registers in such a heavily register-based statistical system. There are further discussions on how the monitoring of processes in the source registers could be embedded in the upcoming national data governance model.

A new mission on data provision emerges for Statistics Finland

Since 2015, Statistics Finland’s wide-ranging development activities have targeted better access and better integration of register data as well as providing better services for researchers by granting access to more microdata in an interlinked and confidentiality-assured way.

The recently growing popularity of tailor-made data access services has resulted in a stronger separation of two different production lines in Statistics Finland’s current work. Besides producing official statistics, Statistics Finland is now able to provide other products with a visible market value. It provides access to processed register-based information and, as such, offers market-oriented data analysis services and data products for customers. The demand for this custom-made service has been growing significantly in recent years, reaching more customers through such a tailor-made approach. Sometimes tabular products are still accompanied by some analysis, but in most cases customers gain access to the vast amount of coherent microdata based on their research needs. Nevertheless, users consider these services costly, while Statistics Finland claims that it needs additional funding from its budget to implement these tasks and is not able to operate such services on a fully overhead-cost basis. Finally, senior management in the strategic plans separates these two production lines, and builds a new business activity based on the provision of its new ‘data stewardship’ services.

Improvements in communication

While the redesign of the Statistics Finland website is still a work in progress, Statistics Finland has implemented several improvements to provide for better visibility in mass and social media. Statistics Finland has started to produce regular broadcasts via its own television studio. Such short broadcasts appear in national television programmes and are available, with frequent updates, on Statistics Finland’s own YouTube channel. It has also become very active on Instagram and Facebook.
5. COMPLIANCE WITH THE CODE OF PRACTICE AND FUTURE ORIENTATION

5.1 STRENGTHS OF THE NSI AND THE PARTICIPATING ONAs IN RELATION TO THEIR COMPLIANCE WITH THE CODE OF PRACTICE

5.1.1 Statistics Finland

A modern and professional statistics authority

The Finnish Statistical System and in particular Statistics Finland relies on an institutional environment rooted in the principles of the ES CoP. More specifically, the Statistics Act¹, the Statistics Finland Act² and the Council of State Decree on Statistics Finland³ provide a strong legal mandate to Statistics Finland. According to the Statistics Finland Act, it shall be Statistics Finland’s function to compile statistics and reports describing the conditions in society and to provide for the general development of official statistics in collaboration with other central government authorities. Statistics Finland’s mandate to collect data involving an obligation to provide data is specified in the Statistics Act, for personal and other data. (ES CoP, Indicator 2.1)

Statistics Finland and other statistical authorities have access to the administrative data of public authorities. As a result, they use these data very extensively, and there is close cooperation between Statistics Finland, the other statistical authorities and the providers of administrative data. (ES CoP, Indicators 2.2 and 8.7)

The professional independence of Statistics Finland and other statistical authorities is laid down in the Statistics Act. According to this Act, statistical authorities and other authorities that compile statistics ‘are professionally independent when performing tasks directly connected with developing, producing and disseminating statistics. These authorities shall operate independently, objectively, reliably and cost-efficiently, and ensure the protection of statistical confidentiality’. (ES CoP, Principle 1 and Indicator 5.1)

The qualification requirements and the rules for appointment of the Director General of Statistics Finland are laid down in the Council of State Decree on Statistics Finland. The function requires a higher-level academic degree, management skills and management experience proven in practice as well as the broad-based experience required by the position’. The Director General is appointed by the Council of State. (ES CoP, Indicator 1.2)

From discussions with different groups of stakeholders, it emerged that Statistics Finland’s independence, including the de facto independence from the Ministry of Finance, is exercised in all statistical matters, and is widely recognised and unchallenged.

With 85 per cent of the workforce having at least lowest level tertiary qualifications, Statistics Finland can rely on well-educated staff. This contributes to Statistics Finland enjoying high levels of trust within the wider administration, user community and the general public. (ES CoP, Indicators 3.1 and 7.5)

Furthermore, Statistics Finland is recognised and valued as the coordinator of the NSS, leading with expertise and hands-on support on all matters regarding the development, production and dissemination of statistics. (ES CoP, Principle 1bis)

**Statistical Confidentiality and data protection**

Statistical confidentiality is maintained according to the legal requirements. The Statistics Act, Section 10, sets out data processing principles: ‘When data collected for statistical purposes are being combined, stored, destroyed or otherwise processed, it shall be ensured that no person’s protection of private life, personal data or business secret shall be endangered.’ Section 11 requires that ‘Statistics shall be compiled so that those they concern cannot be directly or indirectly identified from them…’. The release of confidential data for scientific and statistical production/survey purposes is enacted in Section 13. Violation of statistical confidentiality is regulated in the Statistics Act, Section 24, with a reference to the Criminal Code, Sections 38 and 40. All employees and external parties (e.g. IT maintenance service) sign a commitment on confidentiality. (ES CoP, Principle 5).

Regulatory, administrative, technical and organisational measures are in place to protect the security and integrity of statistical data and their transmission. The general obligation for State authorities to ensure information security is based on the Act on Openness of Government Activities. A new act on Public Administration Information Management (906/2019) and related acts came into force on 1 January 2020. (ES CoP, Indicator 5.5)

Statistics Finland has set up a risk management and preparedness team and appointed a chief preparedness officer. Guidelines and instructions are provided to staff on the intranet (data security principles, guidelines for the application of the Statistics Act, guidelines on the granting of user licences to Statistics Finland’s unit-level data, guidelines on the protection of tabulated personal and business data etc.). Training is organised by the Head of Data Security. (ES CoP, Principle 5)

**Integrated interoperable information**

Statistics Finland systematically pays attention so that any new data can be linked to already existing information and with each other, thus resulting in high data interoperability and process efficiency, and a coherent picture of society at the same time. This is enabled by a systematic and encompassing enterprise and business architecture approach, which oversees and guides the integration of statistical domains into larger data repositories. All business statistics are fully integrated and linked with the business register as a common backbone, allowing data linking on a large scale through an integrated system for business statistics. A similar data warehouse approach based on common identifiers is currently being implemented in the areas of population statistics (comprising up to 75 statistical domains) and environmental statistics. The respective geocoding processes were also harmonised, including the complete building register, in a special centralised information system. Exploitation of this rich database has just started. (ES CoP, Indicators 9.6, 10.3, 10.4 and 11.1)

**Quality management**

Statistics Finland organises quality management based on the Rules of Procedure of Statistics Finland. The Director General holds strategic leadership with the senior management team, which is

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responsible for implementing the operating strategy. Overall performance is monitored three times a year. Each service area (department) has a scorecard, which contains strategic indicators on product quality. They serve as a basis for setting annual goals to achieve planned results with the help of the indicators. The process owners manage process quality and evaluate the risks of the core processes. Development projects to improve data quality are prepared under the supervision of the process owners. Priority setting of projects is supported by the project office and the process groups. (ES CoP, Principle 4 and Indicator 10.1)

Innovative practice: phenomena experts as communicators

Statistics Finland’s dissemination system is currently being revised and, as a result, one new element has been introduced, which the peer review team would like to highlight as noteworthy and possibly applicable in other NSIs: Statistics Finland’s phenomena experts. Enabled by the above-mentioned larger data repositories, statistics will be published under wider phenomena in the future. Since spring 2021, a new layer of experts has been established to convey the bigger picture of current phenomena to stakeholders and the media. The ambition is to have the phenomena experts widely recognised as thought leaders in their topic, thus increasing Statistics Finland’s visibility in a wide range of communication channels. To this end, Statistics Finland has nominated 14 phenomena experts. A multidisciplinary team of communication and other experts, organised in larger groups, each covering broad topics of the statistical programme, support them. The phenomena experts are encouraged to actively participate in media debates, including social media, and attend dedicated events. Starting with their statistical expertise, their training encompasses media influencing, presentation skills, social and general media, writing and blogging as well as peer support and exchanges. Activities are subject to a self-established plan and targets are monitored regularly. (ES CoP, Indicators 11.1 and 15.2)

5.1.2 Other National Authorities

Institute for Health and Welfare (THL)

As one of the four designated statistical authorities in Finland, the Institute for Health and Welfare’s tasks, as defined in its Act of 2008, is responsible for European statistics on social protection and health. Its other tasks broadly relate to studying, monitoring, international cooperation and the provision of research and guidance in the areas of social welfare and health care. THL follows its own ethical guidelines to ensure good governance and public confidence in all its tasks, in addition to its coverage by the Statistics Act. The peer review team was convinced of the Institute’s strong professional ethics, demonstrated by a high degree of awareness of the ES CoP and reinforced by the Institute’s research orientation and expertise. (ES CoP, Principles 1, 7, 8)

Finnish Customs (TULLI)

Finnish Customs (TULLI) is one of the major authorities in Finland producing official statistics. Its institutional environment (a separate statistical unit, headed by the Director of Statistics) enjoys total professional independence and its current practices are advanced and fit for purpose, e.g., a secure server connection to Statistic Finland’s or a special search tool developed for the Combined Nomenclature. The Statistical Unit is independently and entirely responsible for the operation of the data collection for INTRASTAT and the production of statistics on the trade of goods with third

countries. TULLI operates its own trade of goods statistics database (ULJAS) using common international classification standards. It also produces other publications and data releases.

Trade of goods microdata are disclosed for research purposes via Statistics Finland’s remote access system called FIONA. Using this system, a wide range of data integration and linkage options with Statistics Finland’s other statistical databases is possible. These current practices ensure a high level of coherence of trade of goods data with other business data. The confidentiality of microdata is ensured by pseudo-anonymisation.

**National Resources Institute (LUKE)**

The National Resources Institute (LUKE) is defined as a statistical authority by the Statistical Act (280/2004). This guarantees strong independence, and LUKE can implement statistical functions independently from the directives of the Ministry of Agriculture and Forestry and other ministries. The Act on food and natural resources statistics (562/2014) has granted a mandate to LUKE to collect all necessary statistical data. The need to collect and access data is justified, data protection is explained, and all this information is publicly available.

LUKE has elaborated a forward-looking statistical programme 2021–2023 with reference to nationally defined Sustainable Development Goals (SDGs). Its statistical process complies with the Generic Statistical Business Process Model (GSBPM). LUKE has well-developed documentation on statistics production, e.g. statistical process guidelines. Risk management is implemented in the organisation and is part of LUKE’s project management. The risks for each project and statistics are defined in LUKE’s project management tool ‘Projector’.

**Finnish Immigration Service (MIGRI)**

For producing European statistics, MIGRI can rely on a well-maintained administrative register (the UMA register), which closely follows the needs of policy makers. In a highly sensitive field of publicly discussed matters such as asylum and migration, this may seem like a risk-prone approach. However, the peer review team could ascertain that the statistics services in MIGRI succeed in maintaining an objective, neutral treatment of the information on these matters.

**5.2 ISSUES AND RECOMMENDATIONS**

**5.2.1 Enhance coordination**

The Finnish NSS is well-structured and includes a dedicated body – the Advisory Board of Official Statistics of Finland – to promote the system’s coordination, and the coordinating role of Statistics Finland is defined in law. The Advisory Board issues guidelines for quality, which should be applied in all Official Statistics of Finland, and their application is audited. The “Quality Criteria”\(^6\) are compatible with the ES CoP and define which dimensions should be taken into account in the quality of statistical products. The “Recommendation on Quality Description”\(^7\) defines the content of the quality description that should accompany the publication of all Official Statistics of Finland. The “Release Guidelines”\(^8\) provide instructions on publishing modes, identifiers and data presentation modes.

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\(^7\) [https://www.stat.fi/org/tilastotoimi/svt-laatuselostesuositus_en.html](https://www.stat.fi/org/tilastotoimi/svt-laatuselostesuositus_en.html)

concerning data protection provide practical guidelines and recommendations based on existing legislation, most notably the GDPR. An auditing system is in place, internally for Statistics Finland and externally (on a 5-yearly basis) for the ONAs. It will be further developed in the years to come. Overall, the institutional setting for coordination is sound and well documented.

In practice however, ONAs are consistently pointing out that a more proactive coordination would be welcome. Some ONAs asked if the preparation for the ESS directors’ groups and working group meetings could be better coordinated, or that outdated guidelines be more quickly updated; some asked for a continuous discussion on quality reporting. Others asked for regular meetings with the Director General of Statistics Finland, the Heads of Statistics Finland service areas (departments) and the statistical heads of all ONAs, beyond the regular meetings of the Advisory Board.

To improve beyond compliance with the ES CoP, the peer review team recommends:

**R1: Statistics Finland should strengthen a proactive coordination of the Finnish statistical system by sharing good practices and providing methodological and other guidance, as well as tools, and by addressing Other National Authorities at the appropriate levels.** *(Improvement-related, ES CoP indicators 1bis.1 and 1bis.2)*

In the previous round of peer reviews, it was already recommended ‘to set up a well-branded web portal to all official statistics, including a single calendar covering all of Finland’s official statistics’. The peer review team at the time felt rightly ‘that coordination of official statistics would be improved and that the quality rating would get greater prominence if there was a clearly identified portal with a higher profile’. More specifically, a common release calendar would not only be a strong coordination tool but also a clear sign to users on the common quality assurance throughout the system. For technical reasons, the recommendation of the previous round of peer reviews has not yet materialised. However, in the framework of the new website to become available soon, this will be possible.

To improve beyond compliance with the ES CoP, the peer review team recommends:

**R2: Statistics Finland should publish a common release calendar covering at least all European statistics.** *(Improvement-related, ES CoP, indicators 1bis.1, 6.5 and 13.4)*

Statistics Finland has ensured that standard concepts, definitions and classifications are consistently applied in-house and documented in an internal meta-database as well as published on its website. Quality reports for all statistics are compiled in an internal application and will be published on Statistics Finland’s new website.

However, some ONAs still publish metadata and classifications in different formats on their websites. The peer review team was informed that they are willing to work towards a solution on this issue.

Moreover, statistical classifications are mainly maintained by Statistics Finland and reused by other authorities producing official statistics. Some ONAs expressed their willingness to work closely with Statistics Finland on the revisions of classifications and their implementation. For example, the NACE classification, which is a multidisciplinary classification that covers the whole economy, is currently being revised. A new NACE version will have a direct effect across a wide range of statistical products. Therefore, national stakeholders, and especially statistical authorities, could work closely together developing a national version, correspondence tables and a national implementation plan.

To improve beyond compliance with the ES CoP, the peer review team recommends:
R3: Statistics Finland should engage in a continuous dialogue with Other National Authorities on achieving a harmonised approach to metadata, including classifications. (Improvement-related, ES CoP, indicators 1bis.2, 7.2 and 15.5)

In some of the reviewed ONAs, the Statistics Functions are scattered over the organisation as a whole. This could potentially lead to a blurring of the border between the statistical role and other roles, such as policy-related roles.

In the case of the Finnish Immigration Service, the phenomenon is also related to the relatively small size of the organisation involved in administrative tasks. Administrative officers bear several responsibilities in parallel; nevertheless, a more streamlined, delineated background could be established for the production of official statistics.

The production conditions are rather different in the Institute for Health and Welfare, as it is a large organisation with several tasks of general importance in Finnish society, but a more streamlined organisational solution for producing official statistics could also be advisable here.

Although official statistics are produced in a professionally independent way in both organisations, this is rather a natural result of the dispersion of statistical tasks within their operations, and not a planned approach. The mandates of their different administrative tasks should be clarified from an organisational point of view as well, in order to ensure that exercising administrative authority functions does not blend with official statistics activities, which require a different approach, e.g. from confidentiality, quality, accessibility points of view.

To improve beyond compliance with the ES CoP, the peer review team recommends:

R4: The Finnish Immigration Service and the Institute for Health and Welfare should clearly delineate the statistics function within their organisations; the rules and organisational structure should be such that a clear distinction can be made between their role in statistics and the other roles they perform. (Improvement-related, ES CoP, indicator 1.3)

5.2.2 Ensure adequate financial and human resources

Statistics Finland’s financial resources are determined in an annual budgetary process based on detailed planning of new requirements and assessment of their costs. As a rule, the production of European statistics is prioritised and national needs are taken into account to the extent resources will allow. A few statistics depend on the provision of co-financing by other government institutions. Statistics Finland also relies on fees for the provision of custom-made analyses and microdata for research purposes.

While, in principle, Statistics Finland is sufficiently funded and staffed to fulfil its current European and national tasks, it cannot ensure that its ambitions towards users and in the field of innovation will be achieved in the coming years as set out in its strategy. The peer review team found that Statistics Finland’s management has set a far-reaching target of becoming the central data source for all types of users in the country. Some elements of this objective could be reached through efficiency gains and reallocation of resources, but for others, additional financial and human resources will be necessary. This is especially the case for IT, whose budget was substantially cut in the previous years, while the need for IT-based data services is exponentially growing.

To improve beyond compliance with the ES CoP, the peer review team recommends:

R5: Statistics Finland should take initiatives to reinforce its financial and human resources and to ensure their sustainability. Special attention should be paid to IT human and financial resources, as
these are central for innovation, efficiency and modernisation. (Improvement-related, ES CoP, indicators 3.1 and 10.2).

The turnover of staff has been higher in recent times, leading to an increased need for training. Statistics Finland’s internal vocational training plan is well-developed. It is based on the identification of strategic competences, reports to senior management on targets and personal appraisals as well as on detailed discussions in management teams in the service areas (departments). The training plan is implemented within a year and guides training organised centrally by the human resource department for all personnel. In addition to this, service areas (departments) also organise and support the training of their staff (e.g. course fees, salary/unpaid leave of absence).

Instead of traditional training days and face-to-face learning, the use of a variety of online learning, such as online courses, webinars, podcasts and other recordings, has increased. Because of the COVID-19 crisis, many events had to be cancelled. Some training courses were successfully transformed into webinars but others are on hold.

Staff is informed of different conferences and courses. Participation depends on the applicant's strategic importance and role. However, the peer review team was informed that workload and budget limitations hamper participation in training and scientific exchanges beyond a collaboration with selected Nordic countries. This poses a risk in terms of Statistics Finland’s ability to sustain its path towards modernisation, innovation and continuous improvements, given the importance of peer exchanges and knowledge transfer for staff skills and motivation.

To improve beyond compliance with the ES CoP, the peer review team recommends:

**R6:** Statistics Finland should systematically increase the exposure of its staff to training and scientific exchanges, going beyond the Nordic collaboration and including those offered by the European Statistical System. (Improvement-related, ES CoP, indicators 7.6 and 7.7)

### 5.2.3 Extend involvement in changes in administrative data and increase the use of other data

Statistics Finland has comprehensive access to a wide range of administrative data. The Statistics Act, Sections 14 and 15, describes the obligation of public administration bodies to provide Statistics Finland with the appropriate data needed for statistics production. There are framework agreements between Statistics Finland and the most important administrative data providers. The agreements aim to ensure access and quality of the data. There is a dedicated coordinator for each of the main administrative data providers, whose duty is to monitor that the actual datasets can be reliably used for statistics production. There are regular meetings of senior management and at expert level, especially when major elements of the contents are to be changed.

However, as more statistics are being produced from administrative and other data, changes in these datasets present new challenges in detecting errors and producing statistics. In a system that depends on the sustainable availability of data in terms of content, access modalities, frequency, etc., any changes in the administrative data may pose a potential risk for data production and quality. While collaboration seems to function well on a bilateral and informal basis, more structured and guaranteed involvement in decision-making on administrative data, including foreseen modifications, seems to be lacking at times. This can be the case for Statistics Finland but also for ONAs.

To improve beyond compliance with the ES CoP, the peer review team recommends:
R7: Statistics Finland and those authorities providing data to Statistics Finland should ensure that appropriate mechanisms are in place to secure that Statistics Finland is involved at an early stage when administrative data systems are being developed or reviewed so that the needs of official statistics are taken into account. *(Improvement-related, ES CoP, indicator 2.2)*

Due to the pressing needs in the field of asylum and migration policy, changes in administrative procedures can be rather frequent. This is a potential threat to the continuity of statistics on asylum and migration. In order to mitigate this risk, statisticians should be involved in the decision-making process.

To improve beyond compliance with the ES CoP, the peer review team recommends:

R8: The Statistics Function in the Finnish Immigration Service should be involved in the decision-making process that could induce changes in administrative procedures. *(Improvement-related, ES CoP, indicator 2.2)*

Privately held data are rapidly becoming a potential means for enriching statistics and creating new products. However, it is still unclear, including in Finland, how the access to such data for statistical purposes could be guaranteed. Some privately held data which cannot be accessed under current legislation, such as mobile telephone data, would be useful for the production of official statistics. Some of these data, such as scanner data, have been integrated into statistics production, but access to these data is contract-based. The sustainability of such contracts is not guaranteed.

To improve beyond compliance with the ES CoP, the peer review team recommends:

R9: Statistics Finland and the Finnish Government should ensure that appropriate legal and/or other mechanisms are in place to grant Statistics Finland the authority to use privately held data. *(Improvement-related, ES CoP, indicator 2.4)*

Due to the COVID-19 crisis, face-to-face data collection (CAPI) was further replaced by telephone (CATI) and online (CAWI) modes of data collection. As online response rates are not high, Statistics Finland is increasingly developing and strengthening its call centres. Many countries have initiated discussions with public institutions and private organisations (e.g. mobile operators) on obtaining contact information (emails and telephone numbers) for natural persons included in the surveys on persons and households. The peer review team observed that Statistics Finland does not have access to such contact information of natural persons. Statistics Finland statisticians were worried about keeping response rates at a satisfactory level as response rates usually have an effect on survey data quality.

Therefore, Statistics Finland should address public authorities that hold registers of natural persons and have their contact information for administrative purposes. In addition, mobile telephone operators could be targeted to acquire access to the telephone numbers of respondents (population) sampled for surveys. The peer review team also suggests that access to the contact information of statistical survey respondents could be provided upon request of the statistical institution based on legislation, in order to strengthen Statistics Finland’s mandate to gain access to data that are essential for the efficient fulfilment of its tasks. This would allow better response rates to be retained for regular surveys.

To improve beyond compliance with the ES CoP, the peer review team recommends:

R10: Statistics Finland, the Finnish Government and national authorities holding contact data should ensure that appropriate legal and/or other mechanisms are in place to grant Statistics Finland access to contact information obtained from other public authorities, including mobile telephone numbers,
email addresses and fixed line numbers for data collection purposes, in order to increase response rates. *(Improvement-related, ES CoP, indicator 2.2)*

### 5.2.4 Strengthen user orientation

Statistics Finland coordinates the activities of the NSS in the Advisory Board of Official Statistics. There are also over 60 statistical working groups to improve the coordination and development work on official statistics at different expert levels. Other forms of consultations with ministries and other stakeholders take place on a more ad hoc basis. By doing so, emerging user needs get mostly channelled into the work of Statistics Finland. The current measures result in a less formal system of dialogues among producers in Finland, where incoming needs and issues are addressed either at senior management level from a very strategic point of view, or through a bottom-up approach at expert level.

In this setup, a sufficiently high-level consultation on user needs seems to be missing. Even though the entire society shares a generally high level of trust in government and public administration, and these measures seem to work quite effectively, the peer review team identified a growing need for a more systematic user involvement. This would enable Statistics Finland and other producers of official statistics to react to newly emerging needs or to prioritise between different data requests. The newly created statistical programme is an overarching tool to steer the production of European statistics by Statistics Finland and ONAs. The process of preparing this programme could include user consultations. By doing so, its role could be enhanced to become a vehicle for a more formalised user-producer-dialogue on a regular basis and at a sufficiently high level, where decisions on data to be collected could be taken on board. Such a dialogue could complement the existing internal and external consultation structures, such as the Advisory Board on Official Statistics, where mainly producers of official statistics are represented, and dedicated working groups with rather specialised users, since these consultations seem to be at a level that is either too high or too specific for the purpose.

To improve beyond compliance with the ES CoP, the peer review team recommends:

**R11:** Statistics Finland should set up a more systematic process of stakeholder consultations during the preparation of the statistical programme. This would allow a broader societal dialogue on evolving user needs, bridging the current gap between the involvement of very few external stakeholders via the Advisory Board on Official Statistics and consultations of specialised users via working groups. *(Improvement-related, ES CoP, indicators 11.1 and 11.2)*

Statistics Finland’s data warehouse approach is already well-developed and includes future-proof solutions for data integration to derive new products faster. Statistics Finland offers a wide range of information services. The entire website of Statistics Finland is metadata-driven and visitors may find the information from different entry points and search methods. They also already benefit from tailor-made tabulations and broad access to microdata. The vast amount of information is currently grouped to focus on the published releases, the main figures of the country and the statistical database. While experienced regular users of the website (lead journalists, scientists) are familiar with the rather sophisticated access solutions and opportunities, e.g. while applying for microdata, using RSS feeds or other access solutions in their work, less frequent or specialised users may experience difficulties already at the stage of discovering what kind of information provided by Statistics Finland or by other producers of official statistics could be available and how to access it. Current solutions might allow users to find exactly what they were looking for but offer a less broad perspective on further possible topics of interest.

To improve beyond compliance with the ES CoP, the peer review team recommends:
R12: Statistics Finland should provide more guidance to various user profiles on the wealth of information available, in order to help them navigate through the database and make what is available more explicit. (*Improvement-related, ES CoP, indicators 15.1 and 15.2*)

Statistics Finland has a well-organised system for accessing microdata for research purposes. However, if users need microdata from different sources, they sometimes have to apply through different channels. While for example TULLI allows access to its microdata within the FIONA system, operated by Statistics Finland, other producers maintain their own solutions.

Also, accreditation and dataset preparation procedures are rather slow, even if the processing times are significantly shorter today than in the past. At the same time, the technical solution of remote access to tailor-made microdata-sets is considered by users to be expensive. The access to microdata is offered via a specific secure channel, which can only be used if the customer has purchased the matching hardware from the national service provider. The peer review team was informed that the memory capacity offered for larger microdata operations is sometimes considered insufficient. However, purchasing an additional set of hardware for this purpose makes the access even more costly for researchers. In addition to the hardware costs, there are also processing costs, which are based on the workload for the preparation of the database and payable to Statistics Finland.

Research projects face financial challenges and need to be planned in advance and budgeted very carefully, in order to take into account the delays in data access and their expected – and uninterruptedly rising – costs. The peer review team is aware that supplying microdata is also a source of income and some elements of the total cost of access are not under the responsibility of Statistics Finland. However, a balance should be struck between user orientation and commercial aspects.

To improve beyond compliance with the ES CoP, the peer review team recommends:

R13: Statistics Finland, in collaboration with relevant Other National Authorities, should aim at a more uniform access to microdata throughout the entire statistical system. At the same time, Statistics Finland should aim at accelerating access to microdata for research purposes and a more user-friendly cost policy. (*Improvement-related, ES CoP, indicators 1bis.1 and 15.4*)

The National Resources Institute (LUKE), as an ONA, produces high-quality agricultural, forestry and fishery statistics. However, as LUKE was formed by merging several institutions, it still has different IT solutions, databases and methods for data collection and analysis. The development goal is to apply unified standards and processes to all statistics.

LUKE publishes its statistical information on its website in textual form, along with statistical tables and graphs. Its quality reports are prepared in accordance with the Official Statistics of Finland guidelines (they contain brief textual information and no quality indicators) but are not yet published following the SIMS 2.0 structure. While quality reports contain a short description on revisions, a revision policy is not available. A release calendar is available for one calendar year, which makes it difficult for users at the end of the year to acquire information on releases planned for early the following year. LUKE’s process guidelines are available only in Finnish and instructions for access to microdata for research purposes are available in Finnish and Swedish.

To improve beyond compliance with the ES CoP, the peer review team recommends:

R14: The National Resources Institute, as an Other National Authority, should use its full ICT potential (through standardisation and automation) to deliver more user-friendly and modern services. It should also improve and extend the publicly available information on its website (including its revision policy and quality reporting) and make it available in English. (*Improvement-related, ES CoP, indicators 10.2, 15.2 and 15.7*)
5.3 VIEWS OF THE NSI, AS THE NATIONAL COORDINATOR OF THE NSS AND THE PEER REVIEW, ON THOSE RECOMMENDATIONS WHERE THEY DIVERGE FROM THE PEER REVIEW EXPERTS’ ASSESSMENT

None
# ANNEX A – AGENDA OF THE VISIT

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<tr>
<th>Timing</th>
<th>Topic</th>
<th>Participants</th>
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<tr>
<td></td>
<td><strong>Day 1: Institutional environment (ES CoP Principle 1)</strong></td>
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<tr>
<td>9.00-10.00</td>
<td>Preparatory meeting: practical aspects of the visit and getting to know each other.</td>
<td>The peer review expert team: All</td>
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<td>National Peer Review Coordinator</td>
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<td>Event Coordinator</td>
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<td>10.00-11.00</td>
<td>Presentation of the National Statistical System, Discussion on Professional Independence</td>
<td>The peer review expert team: All</td>
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<td>Director General</td>
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<td>Deputy Director General: Enabling Services</td>
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<td>Deputy Director General: Partnership and Ecosystem Relations</td>
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<td>11.00-11.15</td>
<td>Coffee break</td>
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<tr>
<td>11.15-12.45</td>
<td>Institutional setup, role of the Advisory Board, discussion on the Statistical Council</td>
<td>The peer review expert team: All</td>
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<td>Statistics Finland:</td>
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<td>Director General Economics Department of the Ministry of Finance, member of Statistics Finland's Advisory Board and 3 staff members</td>
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<td>12.45-13.45</td>
<td>Lunch</td>
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<td>13.45-15.15</td>
<td>Work on the reform of the Statistics Act and role of Statistics Finland in the future</td>
<td>The peer review expert team: All</td>
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<td>Director of International Affairs and 2 staff members</td>
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<td>15.15-15.30</td>
<td>Coffee break</td>
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<td>15.30-17.00</td>
<td>Statistical programme</td>
<td>The peer review expert team: All</td>
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<tr>
<td>17.00-18.00</td>
<td>Peer review expert team discussion</td>
<td>Head of statistics, Information and Statistical Services and 2 staff members</td>
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<td><strong>Day 2:</strong></td>
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<td>9.00-10.30</td>
<td>Confidentiality (law-based vs risk-based approach; influence of public records and timeliness issues)</td>
<td>The peer review expert team:</td>
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<td>Senior Adviser, Data Protection</td>
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<td>Senior Statistician/Statistical disclosure methods</td>
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<td>Senior Adviser/Risk management, Coordination</td>
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<td>10.30-10.45</td>
<td>Coffee break</td>
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<td>10.45-11.45</td>
<td>Coordination: introductory session</td>
<td>The peer review expert team:</td>
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<td>Statistics Finland:</td>
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<td></td>
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<td>3 staff members</td>
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<tr>
<td>11.45-12.45</td>
<td>ONAs: sessions in parallel: Finnish Customs (TULLI)</td>
<td>Session 1: TULLI</td>
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<tr>
<td></td>
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<td>The peer review expert team:</td>
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<tr>
<td></td>
<td></td>
<td>József Kárpáti</td>
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<tr>
<td></td>
<td></td>
<td>Jolanta Minkevica</td>
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<td>TULLI:</td>
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<td>Director of Statistics</td>
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<td>Senior Customs Officer</td>
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<td>Senior Customs Officer</td>
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<td>Session 2: MIGRI</td>
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<td>The peer review expert team:</td>
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<td></td>
<td></td>
<td>Stephan Moens</td>
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<td></td>
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<td>Martina Hahn</td>
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<td>MIGRI:</td>
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<td></td>
<td>Head of Statistics</td>
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<tr>
<td>12.45-13.45</td>
<td>Lunch</td>
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<td>The peer review expert team:</td>
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<td>Martina Hahn</td>
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<td>Stephan Moens</td>
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<td>THL:</td>
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<td>Data Management Director</td>
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<td>Head of Unit</td>
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<td>Research Professor</td>
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<td>Development Managers</td>
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<td></td>
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<td>Senior Planner, Statistics and Registers</td>
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<tr>
<td>Time</td>
<td>Event</td>
<td>Participants</td>
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<tr>
<td>14.45-15.45</td>
<td>Coordination: wrap-up session</td>
<td>The peer review expert team: All</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Statistics Finland: 2 staff members</td>
</tr>
<tr>
<td>15.45-16.00</td>
<td>Coffee break</td>
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<tr>
<td>16.00-17.00</td>
<td>Innovative projects: Trade in Value Added (TiVA) and Experiences of using mobile data</td>
<td>The peer review expert team: All</td>
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<td>Statistics Finland (TiVA):</td>
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<td></td>
<td></td>
<td>Head of Statistics/Methods</td>
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<td></td>
<td></td>
<td>Senior Statistician/Enterprise, Globalisation and Innovation Group,</td>
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<td></td>
<td>Senior Statistician/Project leader of TiVA</td>
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<td>Statistics Finland (mobile data):</td>
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<td></td>
<td></td>
<td>Head of development</td>
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<tr>
<td>17.00-18.00</td>
<td>Peer review expert team discussion</td>
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</table>

**Day 3: Quality, data collection, data architecture, data warehouse (ES CoP Principles 3, 4, 7, 8)**

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
<th>Participants</th>
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</thead>
<tbody>
<tr>
<td>9.00-10.00</td>
<td>Quality management and work on the quality of administrative data, Involvement of Statistics Finland in the design and development of administrative records.</td>
<td>The peer review expert team: All</td>
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<td>Statistics Finland:</td>
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<td></td>
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<td>Quality Manager</td>
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<td>Project leader of Data quality framework project</td>
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<td></td>
<td>Head of Development/Development and Digitalisation</td>
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<tr>
<td>10.00-11.00</td>
<td>Metadata and quality reporting</td>
<td>The peer review expert team: All</td>
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<td>Statistics Finland:</td>
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<td></td>
<td>Head of Development/Geoinformation, Metadata, and Data Standards Group</td>
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<td></td>
<td>Senior Statistician/Product owner of quality reporting system</td>
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<td></td>
<td></td>
<td>Quality Manager</td>
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<tr>
<td>11.00-11.15</td>
<td>Coffee break</td>
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</table>
| 11.15-12.45 | Current status on the data collection side (non-response issues, other concerns, weaknesses and plans). | The peer review expert team: All
Statistics Finland: Researcher/Data Collection Services Group Senior Statistician/Data Collection Services Group |
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<tbody>
<tr>
<td>12.45-13.45</td>
<td>Lunch</td>
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</table>
| 13.45-15.15 | Session on the current status and future plans of the data warehouse, data architecture, administrative data sources | The peer review expert team: Martina Hahn József Kárpáti Jolanta Minkevica
Statistics Finland: Business Architect Head of Development/Enterprise Architecture |
| 15.15-15.30 | Coffee break |                                                                                                                                      |
| 15.30-17.00 | Data integration and data consistency of business statistics | The peer review expert team: Martina Hahn József Kárpáti Jolanta Minkevica
Statistics Finland: Senior Statistician/Product owner of YTY-system, Senior Statistician/Enterprise Data Repository Group, Senior Statistician/Enterprise, Globalisation and Innovation Group, Senior Statistician/National Accounts Group |
| 17.00-18.00 | Peer review expert team discussion |                                                                                                                                      |

**Day 4: Junior staff, staff training, stakeholders, dissemination (ES CoP Principles 1, 3, 4, 6, 11, 12, 13, 15)**

| 9.00-10.00 | Session with junior staff | The peer review expert team: All
Statistics Finland: Senior Statistician/Research services group Senior Statistician/Balance of payments and financial accounts group Senior Statistician/Housing and Construction Group Senior Statistician/Housing and Construction Group Applications Analyst/System Development Quality Group Senior Statistician/Interview Data Collection Group |
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<tbody>
<tr>
<td>10.00-11.00</td>
<td>Human Resources: Staff training</td>
<td>The peer review expert team: All</td>
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<tr>
<td>Time</td>
<td>Session</td>
<td>Attendees</td>
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<tr>
<td>11.00-11.15</td>
<td>Coffee break</td>
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<tr>
<td>11.15-12.15</td>
<td>Stakeholders: Media</td>
<td>The peer review expert team: All</td>
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<td>Stakeholders: Metropolitan Area Leading News Media</td>
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<td>Leading news media in Western and Northern Finland</td>
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<tr>
<td>12.15-13.15</td>
<td>Lunch</td>
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<tr>
<td>13.15-14.15</td>
<td>Stakeholders: Academia and non-academic</td>
<td>The peer review expert team: All</td>
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<td></td>
<td>research</td>
<td>Stakeholders: Researcher/University of Helsinki</td>
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<td></td>
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<td>Researcher/Finnish Institute for Health and Welfare</td>
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<tr>
<td>14.15-15.15</td>
<td>Stakeholders: Power users, data holders</td>
<td>The peer review expert team: All</td>
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<td>Stakeholders: Finnish Tax Administration</td>
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<td>Haahtela group (provides price data for construction statistics)</td>
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<td></td>
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<td>Macroeconomic expert and economist</td>
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<tr>
<td>15.15-15.30</td>
<td>Coffee break</td>
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<tr>
<td>15.30-17.00</td>
<td>Dissemination and communication: new website</td>
<td>The peer review expert team: All</td>
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<td>and dissemination system; proactive</td>
<td>Statistics Finland: Director of Communications</td>
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<td>communication in a changed media environment</td>
<td>Web Editor-in-Chief</td>
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<td>Chief Communication Officer</td>
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<tr>
<td>17.00-18.00</td>
<td>Peer review expert team discussion</td>
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**Day 5: Innovation, clarifications and final meetings**

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<thead>
<tr>
<th>Time</th>
<th>Session</th>
<th>Attendees</th>
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<tbody>
<tr>
<td>9.00-10.00</td>
<td>Innovation and the organisational and</td>
<td>The peer review expert team: All</td>
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<td>strategic measures to take in this respect.</td>
<td>Statistics Finland: 3 staff members</td>
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<tr>
<td>Time</td>
<td>Session</td>
<td>Participants</td>
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<tr>
<td>10.00-11.00</td>
<td>Session for any clarifications (not needed)</td>
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<td>11.00-11.30</td>
<td>Coffee break</td>
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<tr>
<td>11.30-13.00</td>
<td>Final meeting with ONAs</td>
<td>The peer review expert team:</td>
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<td>All</td>
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<td>Statistics Finland: 2 staff members</td>
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<td></td>
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<td>THL: 6 representatives</td>
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<td>LUKE: 3 representatives</td>
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<td>TULLI: 3 representatives</td>
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<td>MIGRI: 2 representatives</td>
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<tr>
<td>13.00-14.30</td>
<td>Final meeting with senior management of the NSI</td>
<td>The peer review expert team:</td>
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<td>All</td>
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<td>Statistics Finland: Director General, 3 Deputies Director General</td>
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</tbody>
</table>
ANNEX B – LIST OF PARTICIPANTS

Statistics Finland:

Director General
Deputy Director General: Enabling Services
Deputy Director General: Information and Statistical Services
Deputy Director General: Development and Digitalisation
Deputy Director General: Partnership and Ecosystem Relations
Director of International Affairs
Head of statistics, Information and Statistical Services
Senior Adviser, Data Protection
Head of Data Security
Senior Statistician/Statistical disclosure methods
Senior Adviser/Risk management, Coordination
Head of Statistics/Methods
Senior Statistician/Enterprise, Globalisation and Innovation Group
Senior Statistician/Project leader of TiVA
Head of development
Quality Manager
Project leader of Data quality framework project
Head of Development/Development and Digitalisation
Head of Development/Geoinformation, Metadata, and Data Standards Group
Senior Statistician/Product owner of quality reporting system
Researcher/Data Collection Services Group
Senior Statistician/Data Collection Services Group
Business Architect
Head of Development/Enterprise Architecture
Senior Statistician/Product owner of YTY-system
Senior Statistician/Enterprise Data Repository Group
Senior Statistician/Enterprise, Globalisation and Innovation Group
Senior Statistician/National Accounts Group
Senior Statistician/Research services group
Senior Statistician/Balance of payments and financial accounts group
Senior Statistician/Housing and Construction Group
Senior Statistician/Housing and Construction Group
Applications Analyst/System Development Quality Group
Senior Statistician/Interview Data Collection Group
Human Resources Manager
Head of Training/Human resources and law group
Head of Training/Human resources and law group
Director of Communications
Web Editor-in-Chief
Chief Communication Officer
Event Coordinator

ONAs:

Finnish Customs (TULLI)

Director of Statistics
Senior Customs Officer
Senior Customs Officer
Finnish Immigration Service (MIGRI)
Head of Statistics
Staff member

Institute for Health and Welfare (THL)
Data Management Director
Head of Unit
Research Professor
2 Development Managers
Senior Planner, Statistics and Registers

National Resources Institute (LUKE)
Director of Statistics
Head of Statistics
Group Manager, Senior Statistician

Stakeholders
Director General Economics Department of the Ministry of Finance, member of Statistics Finland’s Advisory Board
Metropolitan Area Leading News Media
Leading news media in Western and Northern Finland
A researcher from the University of Helsinki
A researcher from the Finnish Institute for Health and Welfare
Finnish Tax Administration
Haahtela group (provides price data for construction statistics)
A macroeconomic expert and economist