

***Symposium: Safeguarding Trust in Official Statistics –
Launching a Code of Practice for the Irish Statistical System***

**Safeguarding Trust in Irish Official Statistics:
A Code of Practice for the Irish Statistical System**

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Abstract: For official statistics to be of value they must be trusted. Achieving and maintaining trust requires that statistics are produced in an objective, transparent and independent manner. In many countries codes of practice for official statistics have been developed to enshrine those principles and protect trust. While compilers of European statistics are expected to comply with the European Statistics Code of Practice, no comparable standard has existed in Ireland for other national official statistics. The introduction of a code of practice for compilers of official statistics in the Irish Statistical System addresses this gap.

Keywords: code of practice, official statistics, Irish statistical system

1. INTRODUCTION

In November 2011, the Department of Public Expenditure and Reform published their plan ‘Public Service Reform’ (DPER, 2011) which outlined how customer services and public sector efficiency was to be improved over the coming four or five years. This plan explicitly recognized that good quality data and information was essential to deliver on these ambitions. As part of this plan, the Central Statistics Office (CSO) was assigned the task of developing ‘*a code of practice and standards for the gathering and use of data for statistical purposes in the Public Service*’ (2011, p.10). The Code of Practice for the Irish Statistical System outlined in this paper addresses this directive.

The Code of Practice for the Irish Statistical System will also help to align national practices with European norms. While a code of practice for official European statistics has been established for almost a decade¹⁴, a national code of practice providing guidance on the compilation of official statistics has never been put in place. The aim of the code outlined in this paper, is to provide a set of simple guidelines or rules that are designed to synchronise standards across all official statistics in Ireland and not just those published by CSO. The Code of Practice for the Irish Statistical System is consistent with, but only a subset of the European code, reflecting the current maturity and absorptive capacity of the Irish Statistical System.

Although the idea of an ‘Irish Statistical System’ was clearly envisaged in the drafting of the 1993 Statistics Act, the concept was first clearly articulated by the National Statistics Board (NSB) in their seminal 2003 – 2008 ‘Strategy for Statistics’ (NSB, 2003a). Ten years later the publication of that strategy, the launch of the Code of Practice for the Irish Statistical System is another important milestone in the formal development and acknowledgement of that system. To support the code, a new website (www.isscop.ie) has been launched along with a formal logo to help brand the code and the system itself.

This paper is presented in seven sections. The first section provides a brief history of the development of the Irish Statistical System over the past ten years. This is followed by a more formal explanation of the Irish Statistical System. The following sections then explain what official statistics are and why a code of practice is needed. Some international comparisons are provided for comparative purposes. The Code of Practice for the Irish Statistical System is then summarised and some future plans regarding implementation are outlined.

¹⁴ A European Statistics Code of Practice was first published in 2005.

2. THE EMERGENCE OF AN 'IRISH STATISTICAL SYSTEM'

In 2003 the National Statistics Board, the statutory body charged with guiding the strategic direction of official statistics in Ireland, published a 'Strategy for Statistics' covering the period 2003 – 2008 (NSB, 2003a). Recognising the rapidity of change within society and the economy, the thrust of this medium-term strategy centred on the need to develop a coherent '*whole-system*' approach to the compilation of official statistics in an '*information age*' and argued that a fundamentally new approach was required.

In broad terms, the NSB proposed that a statistical system must be: needs driven; user oriented; quality certified; and cost effective. Costs in particular, pose a challenge, as Ireland's small size prohibits economies of scale, making statistical surveys comparatively expensive. However it had long been recognised that various Government Departments and State Agencies held 'islands' of potentially useful administrative data. Consequently, one of the fundamental tenets of the NSB report was to '*harness all the potential of existing data sources*'. It was also recognised that, with a growing emphasis on Government transparency and accountability a statistical system must be able to support '*evidence-based policy making*' and permit objective policy and performance evaluation.

A key pillar of the NSB strategy was that the CSO should work with Government Departments and Agencies to maximise the use of administrative data to generate official statistics. To support this objective, a series of SPAR (Statistical Potential of Administrative Records) projects were undertaken between 2003 and 2008. These projects involved CSO investigating what administrative data existed in policy departments and assessing the quality and suitability of those data for the compilation of official statistics. An assessment was also made as to whether existing data holdings were sufficient to support the stated policy objectives of departments. The overall SPAR programme was undertaken in three distinct projects. The first, concentrated on identification of individual or person records (CSO, 2003; NSB, 2003c), the second (NSB, 2005; CSO, 2006) concentrated on enterprise records and finally there was a project dedicated exclusively to data held by the Revenue Commissioners (CSO, 2009).

A central outcome of the NSB report '*Developing Irish Social and Equality Statistics to meet Policy Needs*' (NSB, 2003b) that followed the first SPAR project was a Government decision that formal data/statistics strategies should be developed by each Government Department. Each Department was required to determine how and to what extent, a department's data needs could be met from within the department; establish what information not internally available was required; identify the data needs in respect of complex and cross-cutting issues with which the department was concerned; and identify how the skills of its staff in using data as a tool for policy evaluation and development could be enhanced. Furthermore it was decided that the NSB, supported by the CSO, would develop best practice guidelines for Departments on how to prepare and implement these strategies. These guidelines were published in 2004 (NSB, 2004).

Following the general election in autumn 2007, policy departments were required to publish a Data Statistics Strategy. The logic behind the requirement on Government Departments to compile a specific strategy for information was that it would force policy makers to consider and prioritise their data needs in a holistic manner. However this has proven to be a slow and rather uneven process.

The NSB report on '*Policy Needs for Statistical Data on Enterprises*' (NSB, 2005) was the result of work conducted by CSO in relation to data needs and sources in eight government departments and their agencies. The report set out a wide range of recommendations including new data requirements and more strategic issues relating to efficiency, effectiveness and respondent burden. Key strategic issues identified were the lack of a universal business identifier (UBI) and a centrally managed public service business register. The report highlighted the potential for the State to interact more efficiently with itself and the business sector, as well as offering enormous downstream statistical benefits. The challenge in implementing these recommendations however was the commitment and co-ordination required between a number of government departments and agencies. Consequently the report recommended that an inter-departmental group be established to assess the feasibility of a UBI. In 2006, the Government established such a group, chaired by the Department of Enterprise, Trade and Employment and asked that they report on feasibility during 2007. This group came together in 2007, but never formally reported any findings.

In 2009, the CSO published '*Statistical Potential of Administrative Records in the Office of the Revenue Commissioners – Working Report*' which catalogued the data sets held by the Revenue Commissioners and an assessment of their potential from a statistical point of view. Following this report a memorandum of understanding was signed between CSO and the Revenue Commissioners, agreeing protocols for secure access,

transmission and storage of data. Significant potential was identified from this study and consequently a formal CSO – Revenue Commissioners liaison group was formally established in July 2009 to facilitate cooperation and act as a clearing house for any problems. This relationship has proven particularly fruitful, allowing CSO to replace some surveys with synthetic data modeled from administrative data (see CSO, 2010). Furthermore, it has allowed CSO to develop some new statistical products such as Enterprise Demography¹⁵ and Job Churn statistics¹⁶.

Approaching the ten year anniversary of the 2003 strategy, the NSB published two position papers (NSB, 2012). These papers concentrated on infrastructural issues, highlighting a number of deficits that exist within the Irish system that are retarding progress. Since the publication of the NSB papers, a number of other policy documents and articles have echoed these views (Ruane, 2013; SE and BMW Regional Authorities, 2013; QQI, 2013). Reflecting on the past ten years, it is evident that considerable progress has been made towards the realization of a fully functioning statistical system. However it is also clear that progress has been uneven and in many cases has been opportunistic rather than systematic. A coherent statistical system supported by an appropriate data infrastructure cannot be said to exist yet. The Code of Practice for the Irish Statistical System is another step towards the systematic realisation of the ambitions outlined in the 2003 and subsequent NSB strategies (NSB, 2009).

3. WHAT IS THE IRISH STATISTICAL SYSTEM?

In Ireland, official statistics are produced by the CSO as well as by a range of other government departments, agencies and state bodies. The Irish Statistical System comprises those parts of the public sector involved in the collection compilation or dissemination of official statistics.

The CSO has been given a formal coordination role to play across the public service in relation to official statistics by the Statistics Act 1993. The following provisions from the Statistics Act are particularly relevant:

Section 11:

- (1) The Office may make arrangements with other public authorities and persons for the collection, compilation, extraction or dissemination of information for statistical purposes.
- (2) The Office shall maintain close and regular contact with the principal users and suppliers of statistics.

Section 30:

- (1) For the purpose of assisting the Office in the exercise of its functions under this Act, the Director General may by delivery of a notice request any public authority to:
 - (a) allow officers of statistics at all reasonable times to have access to, inspect and take copies of or extracts from any records in its charge, and
 - (b) provide the Office, if any such officer so requires, with copies of extracts from any such record, and the public authority shall, subject to *subsection(2)* of this section, comply with any such request free of charge.

Section 31:

- (1) The Director General may request any public authority to consult and co-operate with him for the purpose of assessing the potential of the records of the authority as a source of statistical information and, where appropriate and practicable, developing its recording methods and systems for statistical purposes, and the public authority shall comply with any such request, in so far as resources permit.
- (2) If any public authority proposes to introduce, revise or extend any system for the storage and retrieval of information or to make a statistical survey it shall consult with the Director General and accept any recommendations that he may reasonably make in relation to the proposal.

The CSO has a similar role to play with regard to European Statistics compiled across the Irish Statistical System. Article 5 (1) of Regulation 223/2009 on European Statistics¹⁷ enshrines this coordination role for National Statistical Authorities in European Statistical law.

¹⁵ See Tables BRA01 – BRA 18 on Database Direct (www.cso.ie)

¹⁶ See Tables JCA01 – JCA07 on Database Direct (www.cso.ie)

¹⁷ Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities.

The coordination role, both at national and European level, is designed to ensure consistency and to ensure that best practices are adopted regardless of the national compiler. The focus on standards and best practices is designed to help compilers by ensuring the provision of high-quality statistics but more importantly to provide transparency around the processes involved in the compilation and dissemination of official statistics thus safeguarding public trust (and the trust of relevant international institutions) and confidence in those statistics.

The need for consistency and adherence to standards across the ISS was also reflected in the Public Service Reform Plan (Dept. of Public Expenditure and Reform, 2011), initiative 2.10 (i), where the CSO was tasked with the responsibility to “develop a code of practice and standards for the gathering and use of data for statistical purposes in the Public Service”. The relevance of standards from an eGovernment perspective has also been recognised in “Supporting Public Service Reform – eGovernment 2012 – 2015” (Dept. of Public Expenditure and Reform, 2012, p.13).

4. WHAT ARE OFFICIAL STATISTICS?

The Statistics Act, 1993 defines official statistics as ‘statistics compiled by the CSO or any other public authority under the Statistics Act or otherwise’. This is a very broad definition of official statistics. For practical reasons it is necessary to provide some simple criteria to help identify official statistics. For the purpose of the Irish Statistical System Code of Practice, official statistics are those considered to be of sufficient public interest and satisfy the following criteria:

- Official statistics are produced by or on behalf of a public authority.
- Official statistics are continuous i.e. there should be a reasonable expectation that the published statistic will be regularly updated with new data to provide comparability over time.
- Where a statistic is produced as a “one-off” the Director General of the CSO, in consultation with the responsible public authority, may deem the statistic an official statistic if it is considered to be of public interest.
- Official statistics should be numeric in nature.
- Official statistics must be in the public domain.

The list of official statistics for any public authority will be agreed between the Director General of the Central Statistics Office and the head of the relevant public authority in accordance with the criteria outlined above. In conformity with Section 31 (3) of the Statistics Act, 1993, the National Statistics Board may be asked to arbitrate when agreement cannot be reached.

Official statistics will be listed in a national Register of official statistics. This register will be held on the official Code of Practice website www.isscop.ie.

5. WHY WE NEED A CODE OF PRACTICE

Official statistics are an integral part of any developed democratic society and play an important role in providing evidence to inform decision making by a broad range of users and in particular for policy makers in support of policy formulation and evaluation. To full-fill this function properly statistics must be produced in an independent and objective manner in order to provide an environment that encourages and enables public trust.

Within the international statistical community, National Statistics Institutes adhere to the UN Fundamental Principles of Official Statistics¹⁸. The European Statistics Code of Practice¹⁹, which is consistent with the UN Principles, provides the blueprint for National Statistical Institutes in the European Union. These codes or principles are intended to provide assurances and ensure transparency for users, in effect giving a guarantee that statistics are compiled in an objective and independent manner, in accordance with sound statistical and data management principles using common standards.

In an Irish context many see the CSO as the sole provider of Official Statistics. However, both Official and European Statistics are compiled by a wide range of public authorities. Furthermore, many of the data sources used by CSO to compile statistics are administrative sources originating in other Government Departments and Agencies. These administrative data sources are of growing importance in the context of official statistics.

¹⁸ See <http://unstats.un.org/unsd/dnss/gp/fundprinciples.aspx>

¹⁹ See http://epp.eurostat.ec.europa.eu/portal/page/portal/quality/code_of_practice

The environment in which compilers of official statistics operate is ever-changing and in recent years major international events, such as the global economic downturn and events in a number of EU Member States, have had a significant impact on the statistical world. In recent years there has been an increased awareness and focus on official statistics and their impact on policy decisions. The systems and processes used in the collection and compilation of these data sources will consequently be subject to a greater level of scrutiny under EU law than was previously the case²⁰. It is therefore very important that all data used, whether intermediate or final, are of good quality. It is in this context that the Public Sector Reform plan, published in November 2011, tasked the CSO with developing a Code of Practice for the Irish Statistical System.

While all compilers of European Statistics²¹ in Ireland already adhere to the European Statistics Code of Practice there are in general no common standards in place for the compilation of other official statistics by public authorities other than the CSO. To address this gap a Code of Practice for the Irish Statistical System has been developed.

The role of official statistics is also evolving as they are now being used formally by international institutions such as the EU, ECB, IMF and other bodies to monitor and scrutinize economic performance. This scrutiny means Ireland must continue to adhere to international best practices. The risks involved in doing otherwise would not only have a negative impact on the reputation of the Irish Statistical System but could potentially have an adverse impact on the reputation of Ireland as a nation. A point made by the National Statistics Board in their mid-term strategy review (NSB, 2012, p.13,).

Independence and objectivity are core values of Official Statistics. They are intended to protect the integrity of the data and safeguard public trust in official statistics. These values or principles must remain at the heart of how official statistics in Ireland are compiled, whether by CSO or any other public authority. This is why the development of, and adherence to, an Irish Statistical System Code of Practice is so important.

6. BUILDING ON INTERNATIONAL EXPERIENCE

While the development of a national code of practice is new in an Irish context, this initiative is simply building on international experience, where codes of a similar nature have already been developed and implemented. Many countries simply apply the European System Code of Practice or the UN Fundamental Principles rather than developing their own national codes. Others have developed their own national specific codes to suit national conditions; in general these tend to lean heavily on the UN Fundamental Principles.

Given the level of maturity of the Irish Statistical System it was considered more appropriate at this stage to identify a more targeted set of principles rather than apply the more exacting and comprehensive standards required for European Statistics. The focus at this point is on establishing a pragmatic set of underlying principles that should provide the necessary level of assurance to users while providing space for the Irish Statistical System to evolve and develop.

The following sections provide a very brief summary of the situation in a selection of countries where national codes of practice have been developed.

United Kingdom

The U.K. Statistics Authority is an independent body operating at arm's length from Government. It was established on 1st April, 2008 by the Statistics and Registration Service Act 2007, and has statutory duty to prepare, adopt and publish a Code of Practice for Statistics that set out the professional standards which official statistics are expected to meet. The authority's overall objective is to promote and safeguard the production and publication of official statistics that service the public good.

The Authority also has a statutory duty to assess, for compliance with this Code, all official statistics designated as National Statistics under the previous non-statutory system, and all new candidates for code-compliant status as a preliminary to deciding whether to give them formal accreditation as National Statistics.

²⁰ Regulation (EC) 223/2009 sets out the framework for European Statistics. An amendment to this law, currently being finalised, will lead to greater scrutiny and co-ordination of statistical outputs and the data sources used to compile those outputs.

²¹http://epp.eurostat.ec.europa.eu/portal/page/portal/ess_eurostat/documents/List_other_national_statistical_authorities_final_witho1.pdf

One of the key functions of the Authority is to provide ‘oversight of the UK official statistics system, which includes around 30 central government departments and the devolved administrations, and the promotion, safeguarding and monitoring of quality, comprehensiveness and good practice in relation to all official statistics, wherever produced’ (UK Statistics Authority, 2009: p.i). More details can be found at <http://www.statisticsauthority.gov.uk/>

Finland

Statistics Finland is the general authority within the National Statistical Service of Finland whose main tasks include the direction and development of the National Statistical Service. Statistics Finland and seventeen other agencies and institutions produce Official Statistics of Finland (OFS), of which Statistics Finland compiles approximately three quarters. The most recent edition of their quality guidelines for official statistics was published in 2007 (Statistics Finland, 2007).

The producers of OFS have signed a quality assurance in which they commit to the principles that steer statistics production. The quality assurance guidelines covers issues such as the contents of statistical data, production processes and service to data users.

Compliance with the quality criteria is monitored by the Advisory Board of Official Statistics of Finland and maintains a list of the statistics accepted into Official Statistics of Finland. Release guidelines for OFS are published and can be accessed at http://tilastokeskus.fi/meta/svt/svt-julkaisuhje_2012_en.pdf

New Zealand

Statistics New Zealand is the leader of the Official Statistics System and is the primary producer of official statistics in New Zealand. The Government Statistician, who is also the Chief Executive of Statistics New Zealand, is legally mandated to coordinate statistical activity across government in New Zealand.

In 2003, Statistics New Zealand, the State Services Commission, and the Treasury jointly undertook a review of official statistics and one of the key outcomes was the identification of a set of important statistics that are key performance measures of New Zealand known as ‘Tier 1’ statistics.

‘Tier 1’ statistics are expected to have a high standard of quality, reliability and integrity to engender the confidence and trust expected by Government Ministers and other decision-makers, the New Zealand public, international investors and interest groups. This assurance is provided by the existence and the application of principles and protocols developed for the compilation of tier 1 statistics.

The principles and protocols embody the key aspects of the Statistics Act 1975 and the United Nations Fundamental Principles of Official Statistics, as well as the Privacy Act 1993, the Official Information Act 1982 and the Public Records Act 2005. They apply to all Tier 1 statistics. Adherence to the protocols is regularly monitored by Statistics New Zealand.

Sweden

In Sweden there are twenty seven authorities compiling official statistics. Statistics Sweden is responsible for the co-ordination of official statistics in Sweden and is supported by the Council for Official Statistics which is chaired by the Director General of Statistics Sweden.

Official Statistics in Sweden are regulated through a range of mechanisms including laws, ordinances, guidelines and general instructions. While the Council for Official Statistics is primarily advisory in nature the Council reports on an annual basis and provides an assessment of the extent to which the authorities are implementing and adhering to the various rules and guidelines²².

7. IRISH STATISTICAL SYSTEM CODE OF PRACTICE

The Irish Statistical System Code of Practice (ISS CoP) covers the relevant processes and systems involved in the collection, compilation and dissemination of official statistics. The ISS CoP is a subset of the European Statistics Code of Practice. The European code consists of fifteen principles relating to issues such as institutional aspects, statistical processes and statistical outputs and it applies to all compilers of European Statistics.

²² See http://www.scb.se/statistik/_publikationer/OV9999_2012A01_BR_X43BR1301ENG.pdf

The ISS CoP will apply to the compilation of official statistics produced in Ireland. The principles chosen for the ISS CoP are those deemed most relevant from an ISS perspective. However as the ISS evolves and matures over time so too will the ISS CoP. It is intended to align the ISS CoP fully with the ES CoP over time.

The full detail of the ISS CoP is available on the official website: www.isscop.ie. A summary of the code, where the basic principles are outlined, is given below:

ISS Code of Practice

1. Professional independence
The production of Official Statistics is based on the application of independent, transparent and objective standards and free from any political or other external interference.
2. Timeliness and punctuality
Official statistics are released in a timely and punctual manner in accordance with pre-determined and publicly available release calendars.
3. Accessibility and clarity
Official statistics are presented in a clear and understandable form, released in a suitable and convenient manner, available and accessible on an impartial basis with the appropriate supporting information.
4. Commitment to Quality
All compilers of official statistics should systematically and regularly review processes to support continual improvement in process and product quality. The elements of product quality and some key aspects of process quality against which official statistics will be assessed will be published on the official website (www.isscop.ie). Quality reports based on a template to be compiled by the CSO relating to the statistical process and product/output will be used to review and improve official statistics.
5. Confidentiality
Public authorities that produce official statistics must ensure that statistical outputs do not lead to the direct or indirect identification of an individual person or entity. Additional guidelines will be published on the official website with regard to this matter. It is not intended that in cases where Departments or Agencies already publish information classified by institution (e.g. schools or hospitals) that this practice should cease.

8. LOOKING TO THE FUTURE

The development of the code of practice itself is perhaps the easiest part of the process. The real test and commitment to the underlying principles is yet to come. International experience suggests there are significant challenges associated with implementation and furthermore that it takes time to build awareness and acceptance. The launch of the ISS CoP marks the start of the first phase of the process. The focus during this initial phase will be on awareness building and creating an appreciation of the value of such a code for the development of the Irish Statistical System.

Implementation will follow once the awareness and acceptance phase has been completed. Compliance and certification will be important from a user perspective as they need to be able to differentiate between statistics that are compiled in accordance with the code from those that are not. Statistics that are not compliant with the code may not be afforded the same level of trust and may not be acceptable as the basis for decision making. It is probable that over time non-compliant statistics may be subject to greater levels of doubt, reservation and scrutiny.

Compliance with the ISS CoP will be monitored using a variety of means including:

- Self-assessment questionnaires developed by the CSO; and
- Independent peer reviews. Peer review teams will be led by individuals with proven competence in official statistics. Other members of the team will be drawn from at least two organisations not directly linked to the organisation under review.

This approach is modelled on the approach used to assess Member States compliance with the ES CoP. Improvement actions will be agreed following reviews to provide a focus to strengthen adherence to the ISS CoP. Progress on these actions will be monitored regularly by the CSO as the co-ordinators of the ISS. This work will be resource intensive for both the CSO and the relevant public authorities.

It is possible (and anticipated) that some institutions will quickly begin to adopt the standards or principles of the code. CSO will do everything possible to assist and to facilitate institutions to make the transition to full accredited compliance. Given the overheads associated with monitoring and assessing compliance it is expected that few Government Departments and Agencies will receive accreditation before 2016. The Director General of the CSO will publish an annual report on progress.

9. CONCLUSION

Statistics without trust will not be used irrespective of quality and will consequently be of limited value. Official statistics that enjoy trust will be used to enlighten debate, expedite accountability and inform decision making. Those statistics will be used by a broad range of users including Governments, policy makers, academia, researchers, media, international organisations (e.g. ECB, IMF), ratings agencies and the public. This is why the United Nations, the European Statistical System and many countries around the world have developed statistical codes of practice. Compilers of official statistics have an obligation to ensure they provide high-quality information that adhere to the highest quality standards.

Official statistics in Ireland have weathered the economic storm and have stood up to scrutiny. Today those statistics enjoy a high level of trust. The Code of Practice for the Irish Statistical System is designed to safeguard that trust into the future by enshrining the core principles of independence, objectivity, integrity and confidentiality. The code represents an important milestone in the development of the Irish Statistical System and moves it towards a more logical and structured system.

Successive NSB strategies have highlighted the need to exploit administrative data in the compilation of official statistics and make better use of data in decision making. There are considerable overlaps between those strategies and several national policy documents including Transforming Public Services (Department of Taoiseach, 2008a), Building Ireland's Smart Economy (Department of Taoiseach, 2008b), Public Service Agreement 2010-2014 (Department of Public Expenditure and Reform, 2010) and Public Service Reform (Department of Public Expenditure and Reform, 2011). As more administrative data are used to underpin published statistics, the importance of the principles and standards promoted by the code of practice, will become increasingly important and relevant to all public service information.

The Government has recognized the importance of safeguarding and protecting trust in official statistics and of improving the quality of all public service or administrative data. Hence the CSO was given the responsibility to develop 'a code of practice and standards for the gathering and use of data for statistical purposes in the Public Service' (Public Service Reform, Section 2.10). The code will help to bring common standards and consistency across data sources and published statistics.

Implementing the Code of Practice for the Irish Statistical System cannot be done immediately. Review and accreditation will take time and resources. For some the code will require changes in practice and culture. The CSO will assist in this process in as far as is possible. The aim is not to isolate or criticize any public institutions but to assist all Government Departments and agencies adopt the code and improve the quality of their statistics with the minimum of disruption and cost.

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DISCUSSION

Gerry O’Hanlon: I would like to congratulate all speakers on their excellent presentations tonight! I am particularly pleased, as someone who was actively involved over a number of years in developing the Irish Statistical System (ISS), to be present tonight for the launch of the new code. This is a very important step forward as the full implementation of such a code is absolutely essential in ensuring that official statistics in Ireland, no matter where they are produced, are of high quality and trusted by users.

A former colleague of mine, Pali Lehola the South African Chief Statistician, has repeatedly made a very strong case for ensuring that official statistics are produced in a professionally independent manner. In his view, the availability of trustworthy statistics is now one of three important independent pillars in ensuring good governance and accountability in modern democracies. The other two are a fair judiciary and an effective system for auditing public expenditure. In Ireland the independence of the judiciary and the Comptroller and Auditor General are, of course, recognised in the Constitution. While statistics have not yet been elevated to this status, the independence of the CSO, and its Director General, is well established under national and EU law. Principle 1 of the new code now calls for steps to be taken to ensure that all official statistics are produced throughout the ISS in a professionally independent manner. I cannot emphasise enough how important this is to the overall integrity and credibility of the statistical system. Some speakers tonight have mentioned my current involvement as Chairman of the Good Practice Advisory Committee of the Greek statistical system. In our first report we concluded that the root of the problems with official statistics in Greece is the absence of a culture within the wider political and administrative systems that either understands or accepts the need for professional independence in their production.

A number of speakers have made reference to the definition of official statistics. While the suggested approach under the Code is a good starting point, I feel that something more is required. Criteria should be defined that would address the justification for official statistics, how they are produced and the arrangements for their dissemination. The justification for official statistics must include an assessment of their relevance and the extent to which they are in the public interest. Indeed, whether they are of public interest might also be assessed given the costs involved in their production and dissemination! In order to be labelled as official statistics, the production process must meet high quality standards. These include objectivity, impartiality and the adherence to accepted statistical standards and methods. Furthermore, perceptions around the credibility of official statistics are often driven by the manner in which they are released and, in this regard strict adherence to the principle of equality of access is a key requirement. This may be difficult to ensure in practice outside the CSO, where, for example, statistics may be produced by a small statistical unit within a policy Department where the political imperative is dominant. There may be a tendency to view deviations from the equality principle as merely venal transgressions (e.g. leaking of positive figures in advance as part of a political “spin” operation). However, this in my view is to completely underestimate the negative impact on the perception of the integrity of the overall statistical system.

I am delighted to note the real progress that is now being made in regard to developing the public data infrastructure thereby facilitating the realisation of the statistical potential of administrative data, both of which have been priority objectives of the CSO and the National Statistics Board for many years. Increased availability and accessibility, however, brings with it the need to be extra vigilant in ensuring full adherence to the principle of statistical confidentiality and to data protection requirements. The potential reputational damage of any breaches is increasing all the time as some recent data protection problems elsewhere have shown. The final comment I would make is that the Statistics Act, 1993, which is an excellent piece of legislation and is serving us well, may in due course require amendment to reflect more precisely the needs of the emerging ISS.

Before concluding, it would be remiss of me not to mention that the first draft of the European Statistics Code of Practice was in fact prepared about ten years ago not too far from here by a small taskforce chaired by Donal Murphy, who I am pleased to see is with us tonight. I was privileged to have been a member of the drafting team and I can confirm that Donal’s input to, and influence on, the draft was immense - which will come as no surprise to anyone who knows him! For the record, the initial draft did not require much subsequent amendment and has stood the test of time. As the European Code is now widely regarded as setting a world standard for official statistics, we within the Irish statistical community and Donal in particular, can be justifiably proud of our contribution!

Joe McNeill: The Central Bank very much welcomes initiative by the CSO to introduce Code of Practice for official statistics. It is very important, especially in the current crisis, that all statistics produced by public authorities for policy purposes meet proper criteria in terms of quality, sound methodology, relevance, timeliness etc. The proposed Code of Practice proposed is an important step in that direction. Users of these statistics need to know that they are compiled using clear definitions and metadata that they accord to best international standards and are comparable with other statistics.

The Code offers benefits both to users and compilers of statistics alike. The Bank faces similar challenges in its role as a compiler of financial statistics which are required under a separate legal mandate to support the monetary policy and other tasks of the Eurosystem and the European System of Central Banks (ESCB). In recognition of the importance of high quality statistics, the ESCB has a public commitment for the European Statistics compiled under its remit, which largely mirrors the criteria outlined in the Presentation. The public commitment like the Code of Practice is rooted in the UNs Fundamental Principles of Official statistics.

Co-ordination was referred to in the presentations both at national level and European level. This can often be a difficult process- however significant progress has been made at national level between the Bank and CSO including operating joint surveys of financial sector entities. This is an example of the wider benefits of expanding co-ordination and good practice across public authority statistics. The interaction between professional statisticians and policy departments offers a win-win situation for both, insofar as it can enhance the skill sets of both by exposing them to different expertise and different ways of operating. The application of the Code of Practice across statistics compiled by public authorities can, therefore, only improve the quality of data available to users and policy makers. So I wish CSO well in rolling out the Code of Practice.

Frances Ruane: I would like to thank the speakers for their contributions and I have three questions: In relation to Pdraig Dalton's comments on challenges for rolling out the Code of Practice, I wonder where he sees potential sources of these challenges to progressing this agenda? And maybe Walter Radermacher would like to comment on this also in the context of Eurostat's experience?

Relating to the point that Martin Fraser made about relevance and timeliness, I think that it is a real challenge to both CSO and Eurostat. If they are to be the key sources of evidence to inform policy, they must address how they might develop robust short term indicators. Since 2008 there has been a very significant increase in the number of indicators that are being released from various sources and these will dominate decision making ahead of the release of the official statistics.

All speakers have mentioned the importance of trust in official statistics. An issue for the CSO and Eurostat though is the danger that the perception of statistics overall is damaged by the increasing volume of lower quality of statistics emanating from other sources. I am regularly struck by the juxtapositioning in the media of the results from a major CSO survey alongside results from a minor survey whose quality is unknown. I am not suggesting that one would want to regulate what is released – that would be a step too far - but I do feel that bodies producing official statistics need, alongside improving their own quality through the Codes of Practice, to develop strategies to raise public awareness about the need to question the quality of statistics.

Tom Ferris: I would like to make a brief comment on this evening's presentations and it relates to having trust in Government. I will start with a conclusion reached by Pdraig Dalton in his paper. He said that trust in government is easy to lose, but hard to build. I agree with that conclusion.

The matter of trust is also dealt with Patricia O'Hara's paper. She quotes from a recent publication. Specifically, she notes that the OECD's *Government at a Glance* has shown that in the five years since the recession (between 2007 and 2012), Irish confidence in Government fell from 63% to 35% which is the highest decline in the OECD. But it should be acknowledged that when it comes to trust in key public services in Ireland, our citizens have much higher confidence in public services, according to the OECD survey. In 2012, confidence/satisfaction was highest in education, with 82% of respondents expressing confidence in the Irish education system. This is the highest level of confidence in education recorded in the whole of the OECD. In three other areas of public service, the confidence/satisfaction rates recorded are also quite high. Confidence in An Garda Siochana is shown at 74%, followed by health care at 64% and finally, the judicial system at 62%. These high ratings should give some comfort to government that with the right policies, including putting Ireland's fiscal house in order, trust in government can show an increase by the time the next OECD's *Government at a Glance* is published.

Terry Cocoran: Patricia O'Hara in her presentation has suggested that statistics offices should be prepared to openly correct or address misleading or inaccurate media reports. I would take this to include misleading or erroneous interpretations of what the official data were saying. On the other hand, as I understood him, Pdraig Dalton suggested that the role of the statistical office was limited to the presentation of data and did not extend to interpretation.

I think there is an important role for statistics offices in at least guiding the public interpretation of the data they produce. Take for example the process of multi-lateral surveillance that has become widespread in EU practice. In the area with which I'm familiar – employment policy – surveillance is based on a wide range of indicators that underpin the *Employment Performance Monitor*. This in turn underpins a process that ends with the Commission publishing country-specific policy recommendations that require a majority in the Council to overturn. Similar processes are operating in the social policy and broader economic policy arenas. The original indicators used – generally based on data produced by Eurostat – are critical to these processes. Eurostat could, I think, usefully be more assertive in commenting on these indicators from a quality perspective and on the extent to which the underlying data can support the interpretations being put on the indicators. Guidance from the statistics office could also be useful domestically – for example in relation to the relative usefulness of measures such as GNP, GDP, and GNDI for different purposes in Ireland's particular circumstances.

On a separate point, in some areas there is now a major gap between the limited amount of information that is published in the standard Irish statistical releases and the massive amount of detail that is available in the underlying data. Information is published, for example, on only a few of the fields in the Quarterly National Household Survey, and there are limits on the extent to which even these fields are cross-tabulated. I'm sure this is a resources issue, but it would be good for non-specialist users to have greater ability, through CSO's Statbank, to drill down in more detail into the QNHS data. In some cases, it is already possible for a casual user to access greater detail on the Irish data through the Eurostat website than through the CSO's. The data-query capacity available on the US Bureau of Labour Statistics website also gives an idea of the possibilities here.