

# PEER REVIEW REPORT

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

## SPAIN

HALLGRIMUR SNORRASON  
ISABELLE DE POURBAIX  
JAN MATĚJČEK

FEBRUARY 2015

## TABLE OF CONTENTS

1. EXECUTIVE SUMMARY	3
2. INTRODUCTION	7
3. BRIEF DESCRIPTION OF THE NATIONAL STATISTICAL SYSTEM	9
4. COMPLIANCE WITH THE CODE OF PRACTICE AND THE COORDINATION ROLE WITHIN THE NATIONAL STATISTICAL SYSTEM	11
4.1 Strengths of the National Statistical Institute in relation to its compliance with the Code of Practice and to its coordination role	11
4.2 Issues and recommendations	13
4.2.1 Professional independence	13
4.2.2 Use of administrative records for statistical purposes	15
4.2.3 Use of confidential data for research purposes	16
4.2.4 Human resources	17
4.2.5 Increasing the use of administrative sources	18
4.2.6 Increasing the security of microdata	20
4.2.7 Involvement of external experts in quality reviews	20
4.2.8 Standardisation of statistical processes	21
4.2.9 Issues related to meeting user needs	22
4.2.10 Compliance with the Code of Practice by other national authorities	24
4.3 National Statistical Institute views where they diverge from Peer Reviewers' assessment	25
5. ANNEX A – AGENDA OF THE PEER REVIEW VISIT	26
6. ANNEX B – LIST OF PARTICIPANTS	28

## 1. EXECUTIVE SUMMARY

The national statistical system (NSS) of Spain consists of the national statistical institute (Instituto Nacional de Estadística, INE), the Bank of Spain and statistical units or divisions of several government ministries. These institutions are the producers of European and national statistics. The statistical activities of INE and other government producers are based on the statistical law from 1989 which covers the whole area of statistics. The other main pillar of the NSS is the four-year national statistical plan (PEN) which lists all statistical surveys and statistical activities conducted by the institutions of the NSS, and defines the dissemination of the results. The NSS is held together by INE as the central statistical institute and coordinating body, by a robust structure of cooperation committees, and by the PEN.

INE is a professionally independent and strong institution. Its professional independence is provided for in the law on national statistics which grants INE full powers to carry out its technical duties and exercise its impartial operation. The professional independence of INE is not only set out in legislation but is fully recognised and respected by other producers and the users of statistics. The Peer Review revealed that INE enjoys a very high degree of credibility among users.

One of the main strengths of the NSS is the advanced structure of cooperation commissions and advisory bodies created by law and headed by INE. There are three such bodies at the national level; the High Statistical Council (CSE), the Interministerial Statistics Commission (CIME), and the Interregional Statistics Committee (CITE). The CSE is a strong forum for user consultations and external advisory functions. The CIME is a special forum for the cooperation and coordination of national and European statistics. The CITE is the joint collegiate body of and forum for cooperation between the statistical producers within the central government and the statistical institutes of the 17 autonomous communities of Spain.

INE and the other producers of European and national statistics base their data collection increasingly on administrative records replacing or complementing the traditional questionnaire based surveys. This is partly the result of efforts to contain cost of the statistical activities not least necessitated by the substantial reduction in budgets for statistics for several years following the economic crisis in Spain. The economic adversities have also resulted in a government policy of prohibiting the hiring of staff. At INE, the result is that the number of skilled staff has been severely reduced, there are many vacant positions, and an age gap is opening up owing to the lack of recruitment of junior staff.

Statistical confidentiality is well embedded in both the statistical legislation and operations of the statistical institutions, and is fully in line with the European statistics Code of Practice (CoP). INE lays heavy emphasis on quality and quality management. The quality policy aims at ensuring that the principles of the CoP are observed and complied with. An important feature of the stance on quality is the commitment made by the institutions participating in the PEN to follow the CoP in the statistical operations included in the plan.

INE applies modern statistical methodology and practices which conform in all main respects to the principles of the CoP. INE has participated actively in European and international cooperation and also contributed to the advancement of harmonised methodology and statistical applications at the European level. International and European standards and classifications are applied by INE and the other producers for all the statistical operations included in the PEN. INE is

considered by users to provide extensive and valuable services. The statistics produced and disseminated are said to be objective and impartial, of high quality and reliability.

The main finding of this Peer Review is that the statistical activities of INE are in all main respects in compliance with the CoP. Nonetheless, the Peer Reviewers make a few recommendations to strengthen compliance in specific areas. A few of these involve recommending changes in legislation, in particular concerning the appointment of the President of INE and strengthening the utilisation of administrative data for statistical purposes. The Peer Reviewers also recommend that the ban on recruiting new staff at INE be lifted in order to ease the current workload and counteract the risk of a widening generation gap in the highly educated workforce at INE, both of which may jeopardise the continued generation of European statistics of undiminished quality. There are also other more technical recommendations, such as on standardisation, security of microdata, provision of microdata for research, and on dissemination practices by the different ministries.

## **RECOMMENDATIONS**

### **Professional independence**

1. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, laying down clear provisions for the appointment and dismissal of the President of the National Statistical Institute, in line with the European statistics Code of Practice (European statistics Code of Practice, indicator 1.8).

### **Use of administrative records for statistical purposes**

2. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, authorising the National Statistical Institute to access and utilise microdata from tax records for the purposes of compiling all official statistics set out in the National Statistical Plan (European statistics Code of Practice, Principle 2, indicators 8.7, 8.8 and 8.9, Principle 9 and indicator 10.3).
3. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, making it mandatory for holders of administrative records and registers, which are or may be used for statistical purposes, to inform and consult the Institute on planned changes of the registers and on the design and specifications of registers in order to make them fitter for statistical utilisation (European statistics Code of Practice, Principle 2, indicators 8.7, 8.8, 8.9 and 10.3).

### **Use of confidential data for research purposes**

4. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, authorising the Institute and other producers of official statistics to grant access to confidential data, including microdata, for research purposes and to lay down the main conditions for such access (European statistics Code of Practice, indicator 15.4).

## **Human resources**

5. The Spanish authorities should lift the temporary freeze on recruitment to allow recruitment of skilled staff at the National Statistical Institute (European statistics Code of Practice, indicator 3.1).
6. The National Statistical Institute should organise and implement a system of regular staff appraisal and interviews (European statistics Code of Practice, indicator 10.1).

## **Increasing the use of administrative sources**

7. The National Statistical Institute and other producers of European statistics should extend and harmonise the use of administrative records through increased utilisation of existing registers, adaptation of registers and creation of new registers for statistical purposes (European statistics Code of Practice, Principles 2 and 3, indicators 6.1, 6.2, 8.7, 8.8, 8.9,, Principles 9 and 10).
8. The National Statistical Institute should elaborate and implement procedures and validation rules for assessing and checking the quality of administrative data. Furthermore, the Institute should put in place arrangements for regular provision of feedback to owners of administrative registers used for official statistics on the quality of the register data (European statistics Code of Practice, indicators 8.4, 8.5, 8.9).

## **Increasing the security of microdata**

9. The National Statistical Institute should apply standard tools for anonymisation of microdata files for researchers as well as a tool for monitoring access by database administrators to databases with confidential data (European statistics Code of Practice, indicators 5.5 and 15.4).

## **Involvement of external experts in quality reviews**

10. The National Statistical Institute should develop and implement a plan to involve external experts in regular reviewing of key statistical outputs (European statistics Code of Practice, indicator 4.4).

## **Standardisation of statistical processes**

11. The National Statistical Institute should intensify its efforts to specify and start applying the Generic Statistical Business Process Model across the statistical production processes and introduce systematic standardisation for the different stages of the statistical production process (European statistics Code of Practice, Principle 4, indicators 7.2 and 12.1).

## **Issues related to meeting user needs**

12. In its announcements of delayed publications, the National Statistical Institute should include explanations of the reasons for the divergence from the release calendar (European statistics Code of Practice, indicator 13.4).
13. The National Statistical Institute should develop and implement remote access to microdata for research purposes and lay down specific protocols for such access. (European statistics Code of Practice, indicator 15.4).

### **Compliance with the Code of Practice by other national authorities**

14. The statistical entities of the different ministries in Spain should take the following actions:

- Assume sole responsibility for the press releases and publication of their statistical outputs (European statistics Code of Practice, indicator 1.6 and Principle 6).
- Bring their release calendar practices fully in line with the Code of Practice (European statistics Code of Practice, Principles 13 and 15).
- Adopt and publish clear procedures for the handling of errors and revisions (European statistics Code of Practice, Principle 12).

## 2. INTRODUCTION

This Peer Review report is part of a series of assessments, the objective of which is to evaluate the extent to which National Statistical Institutes (NSIs) and the European Statistical System (ESS)<sup>1</sup> comply with the European statistics Code of Practice (CoP).

The CoP, which sets out a common quality framework for the ESS, was first adopted in 2005 by the Statistical Programme Committee and updated in 2011 by its successor, the European Statistical System Committee. The CoP – 15 principles and related indicators of good practice – covers the institutional environment, the statistical production process and the output of European statistics. The ESS is committed to fully complying with the CoP and is working towards its full implementation. Periodic assessments review progress towards reaching this goal.

The first global assessment, a round of peer reviews in 2006–2008, explored how the NSIs and Eurostat were progressing in implementing the parts of the CoP relating to the institutional environment and dissemination of statistics (principles 1–6 and 15). This resulted in reports for each NSI and Eurostat, available on the Eurostat website<sup>2</sup>. These reports also include a set of improvement actions covering all the principles of the CoP; these informed the annual monitoring of the implementation of the CoP in the ESS in the period 2009-2013.

The scope of this second round of peer reviews is broader: the assessment of CoP compliance covers all principles; the CoP compliance of selected other national producers of European statistics (as well as the NSI) in each country is being assessed; and the way in which statistical authorities coordinate the production and dissemination of European statistics within their statistical systems is being explored.

It should be underlined that there is a fundamental difference between the reports in the previous round of peer reviews conducted in 2006-2008 and the reports from this round. In the 2006-2008 round compliance with principles 1 to 6 and 15 of the CoP was assessed by means of a four-level scale (fully met; largely met; partly met and not met) and improvement actions were agreed on all 15 Principles. After five years of continuous development most of the improvement actions have been implemented and significant progress towards full compliance with the CoP has been made. Therefore, rather than stating the state of play for all principles of the CoP, the reports from the 2013-2015 round mainly focus on issues where full compliance with the CoP has not been found or further improvements are recommended by the Peer Review team.

In order to gain an independent view, the peer review exercise has been externalised and an audit-like approach, where all the answers to the self-assessment questionnaires have to be supported by evidence, has been applied. As in 2006-2008, all EU Member States and EFTA/EEA countries and Eurostat are subject to a peer review.

Each peer review in the Member States and EFTA/EEA countries is conducted by three reviewers and has four phases: completion of self-assessment questionnaires by a country; their assessment by Peer Reviewers; a peer review visit; and the preparation of reports on the outcomes. The peer review of Eurostat has been conducted by the European Statistical Governance Advisory Board (ESGAB).

To test and complete the methodology, it was piloted in two countries, Iceland and Slovakia, over the summer of 2013.

---

<sup>1</sup> The ESS is the partnership between the Union statistical authority, which is the Commission (Eurostat), the national statistical institutes (NSIs) and other national authorities responsible in each Member State for the development, production and dissemination of European statistics. This Partnership also includes the EFTA /EEA countries.

<sup>2</sup> <http://ec.europa.eu/eurostat/web/quality/first-round-of-peer-reviews>

The Peer Review of Spain was conducted by Mr Hallgrímur Snorrason (chair), Ms Isabelle de Pourbaix and Mr Jan Matějček, who conducted a Peer Review visit to Madrid on 17 - 21 November 2014. The programme of the visit is in Annex A and the list of participants in Annex B.

This report focuses on compliance with the CoP and the coordination of European statistics within the Spanish statistical system. The report highlights some of the strengths of the Spanish NSI (INE) in these contexts and contains recommendations for improvement. Improvement actions developed by INE on the basis of this report will be published within the four-week period starting when the final report is sent to the NSI.

### **3. BRIEF DESCRIPTION OF THE NATIONAL STATISTICAL SYSTEM**

#### **Statistics in the Spanish administrative and governance system**

The first level of territorial division in Spain counts 17 autonomous communities and two autonomous cities, 52 provinces and (currently) 8117 municipalities. While the country is highly decentralised regarding administrative and governing competence, the production of national and European statistics is the task of the central institutions of government and is not devolved to the communities. The autonomous communities operate their own statistical offices focusing on statistics for their own territories. There is some cooperation between these statistical offices and the central government and the statistics are to some extent harmonised. For the purpose of this Peer Review, however, the statistical offices of the autonomous communities are not considered as part of the Spanish national statistical system.

#### **Legislation**

The Spanish constitution, in its article 149.1.3, provides that "the State shall have exclusive jurisdiction over statistics for State purposes." The law of 12/1989 on the Public Statistical Function<sup>3</sup> (LFEP) is based on this constitutional provision. It establishes the National Statistical Institute<sup>4</sup> (INE) as the central body of official statistics in Spain and assigns to it the status of an autonomous agency. Other official producers are statistical units belonging to certain ministries and the Bank of Spain. The LFEP lays down the principles governing statistical activities such as data collection, data processing and dissemination. It defines the conditions under which it is mandatory to supply data, regulates statistical confidentiality and statistical planning, and it specifies the national and international cooperation of the state services in the field of statistics.

The LFEP law also establishes three bodies entrusted with advisory or consultative role: the High Statistical Council<sup>5</sup> (CSE), the Inter-ministerial Statistical Commission<sup>6</sup> (CIME) and the Inter-territorial Statistical Committee<sup>7</sup> (CITE). Further legal elaboration is provided in three Royal Decrees, one approving the Charter of INE (Royal Decree 508/2001), and the other two governing the nature, functions, composition, organisation and operation respectively of the CSE (Royal Decree 1037/1990) and of CIME (Royal Decree 1036/1990).

#### **Status of INE in the public administration system**

INE operates under the administrative authority of the Ministry of Economy and Competitiveness. As the central body of government statistics in Spain, INE bears responsibility for the following functions enshrined in Article 26 of the LFEP: coordination, monitoring and supervision of national statistical services; elaboration of the national statistical plan<sup>8</sup> (PEN); drawing up of the inventory of statistics; proposals of methodological standards; supervision of the compliance with statistical confidentiality provisions; compilation of general censuses, major surveys and integrated systems of economic accounts and population and social statistics; use for statistical purposes of data from administrative sources and promotion of such use by other statistical units; creation of directories; design and execution of statistical projects commissioned under the PEN; management of international relations in statistical affairs; and professional development of statistical staff.

---

<sup>3</sup> Ley de la Función Estadística Pública, further LFEP

<sup>4</sup> Instituto Nacional de Estadística, further INE

<sup>5</sup> Consejo Superior de Estadística, further CSE

<sup>6</sup> Comisión Interministerial de Estadística, further CIME

<sup>7</sup> Comité Interterritorial de Estadística, further CITE

<sup>8</sup> Plan Estadístico Nacional, further PEN

### **National Statistical System (NSS)**

Other producers of official statistics than INE and the Bank of Spain operate in almost all ministries of the central government and in some autonomous bodies attached to them. The statistical units of the ministries are involved in the elaboration of the first draft of the PEN, and conduct the statistical operations commissioned to them under the plan and the annual programmes, but are also engaged in statistics relating to their specific domains.

The CSE acts as an advisory body of the state statistical services and as a forum for the main users and producers of official statistics, in a balanced representation. It has around 40 members representing all interest groups of the Spanish society. Its main role is to support the harmonisation of statistics, optimise the use of the resources allocated to producing statistics, to help bringing statistics closer to users' needs, and to facilitate the supply of primary data by reporting units. The CSE proposes the content of a new PEN, issues an opinion on the draft PEN and on all proposals to introduce new statistics laid before it; in addition, it draws up recommendations and deals with consultations.

CIME provides a forum for cooperation between INE, the statistical units of central government and the Bank of Spain. The key aims of the CIME are to coordinate horizontally the activities of statistical units, integrate the statistical information systems associated with the various sector and theme-related fields, encourage the rational use of the available data sources, and to appraise plans to introduce, revise or suppress any administrative record or form used as statistical sources.

CITE is a joint collegiate body of the statistical services of central government and those of the autonomous communities. Members of CITE include the representatives of the statistical offices of each autonomous community. The overall mission of CITE is to support coordination and cooperation among central and regional statistical units.

### **Organisation of INE**

The vision of INE expresses the agency's aspiration to continue being the national and international point of reference for the production of Spanish official statistics, and is aligned to the vision and values of the European Statistical System (ESS). The mission of INE is to offer a high quality official statistical information service that covers the Spanish economy and society, focussing on the values of professionalism, independence and integrity.

The President of INE enjoys the rank of Under-Secretary and is the legal representative of INE. He or she is appointed, for an undefined term, and dismissed by the government by means of Royal Decree, at the proposal of the Minister of Economy and Competitiveness. The governing bodies of INE are the President and the Governing Board which is formed by the senior managers of INE. The organisational structure of INE is composed of two General Directorates and 12 units depending directly on the President. Among these units are the Office of the President, the General Secretariat, the Electoral Census Office, and nine General Sub-directorates for the production of statistics. The General Directorates deal with horizontal issues, respectively methodology, quality and information and communications technology; and planning, coordination and statistical dissemination. INE carries out statistical processing and dissemination activities in its headquarters in Madrid, while it devolves data collection duties to its 52 provincial offices. In 2013, INE counted a staff of 4021, of which 3943 were on permanent contracts. Of these, 1293 had a civil servant status and 2650 were other staff on permanent contract. The 2013 budget amounted to about €185 m as compared with €253 m in 2007.

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

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

The NSS of Spain is not only large as one would expect from such a large country but it is also very complex, reflecting the complex governance structure of the country. For this reason it is all the more important to have a sound legal basis, a coherent statistical system and a strong NSI at the centre with decisive coordination functions. The legal basis of the national statistics is strong and covers the whole area of the statistics. The main legal act is the Law no. 12/1989 on the Public Statistical Function (LFEP). As described above, NSS including production of European statistics, is composed of INE, other state statistical producers, most important of which are the Bank of Spain (not subject to this Peer Review) and the statistical units of government ministries. The system is held together by INE, by a robust structure of cooperation committees, and by the PEN.

INE is a professionally independent and strong institution. Its professional independence is provided for in the statistical law, LFEP, in particular article 30 which grants INE full powers to carry out its technical duties and exercise its impartial operation. INE's technical role covers statistical methodology, the design of standards relating to concepts, definitions, classifications, and the dissemination and presentation of results.

The professional independence of INE is not only set out in legislation but is fully recognised and respected by other producers and the users of statistics. INE enjoys a very high degree of credibility among users. This was without exception brought out in the Peer Review meetings with the different groups of users and expressed by representatives of institutional users, trade unions, business and consumer associations, media and the scientific community. The discussions during the Peer Review visit demonstrated clearly that the professional independence and credibility of INE rests no less on its operations and undisputed record as a fully autonomous, impartial and trustworthy institution than on its formal, legal basis. It was emphasised that the professional, independent status of INE was evidenced by its statistical releases which are said to be invariably objective, impartial and completely free from any political taint.

INE is a specialised statistical institution with a high level of professionalism. INE recruits university graduates, mainly in statistics, economics and other social disciplines, subject to their passing a special entrance examination in several subjects considered to be suitable for candidates for work in official statistics. Upon passing the exams and entering the service of INE as civil servants specialised in statistics, the skills of the new recruits are further enhanced by practical training at the Public Administration School of Statistics operated by INE. In addition to this education, there is a tradition at INE for high level of participation in European and international statistical learning and training, including in conferences, workshops and various fora of technical cooperation and advancement. Hence, INE's staff have a high level of educational attainment and skills as was demonstrated throughout the Peer Review visit.

One of the main strengths of the NSS is the advanced structure of cooperation commissions and advisory bodies created by the LFEP and Royal Decrees and headed by INE. There are three such bodies at the national level; CSE, CIME and CITE. The CSE is a strong forum for user consultations

and external advisory functions. The CIME is a special forum for the cooperation and coordination of national and European statistics. The CITE is the joint collegiate body of and forum for cooperation between the statistical producers within the central government and the statistical institutes of the 17 autonomous communities of Spain. Apart from this, INE consults and coordinates its network of provincial offices through a committee of the main managers of INE and the heads of its provincial offices.

The main instrument for the coordination of the national and European statistical production is the four-year national statistical plan (PEN) which is established by a Royal Decree. The PEN specifies the statistical operations for providing the statistics required by EU regulations and for providing national statistics. The content of the PEN is based on a proposal from the CSE and further agreements between INE and the members of the CIME. The PEN is further specified in annual programmes in which the details concerning the implementation, timing and release of the statistics are spelled out. Both the four year PEN and the annual programmes are monitored by INE, their progress and outcomes reported to the CSE and discussed by the CIME. Thus, there is effective coordination of the operations of the NSS, executed mainly by INE through the PEN, the CIME and the CITE.

The NSS of Spain has a strong legal mandate for collecting data complying with Principle 2 of the CoP. This is set out in the LFEP in a two-fold manner as regards all statistics for central government purposes; on the one hand, INE and the statistical units of government may request all natural and legal persons as well as institutions and public bodies to submit data and these are obliged to do so in a truthful manner; on the other hand, authorities holding administrative records and registers are obliged to submit data for statistical purposes. The only weaknesses in this respect are restrictions on utilising micro level tax data for statistical purposes and lack of provisions obliging holders of administrative data to inform and consult INE on the use of such data for statistical purposes. These issues are discussed later in this report.

Statistical confidentiality is well embedded in both the statistical legislation and operations of the statistical institutions, and is fully in line with CoP Principle 5. Individual statistical data is strictly confidential and the collection of data which may reveal specific sensitive information, such as on ethnic origin, political opinions and religious beliefs, is subject to voluntary response.

INE lays heavy emphasis on quality and quality management. The quality policy aims at ensuring that the principles of the CoP are observed and complied with. The main instruments for this are a Quality Committee established by the Board of Directors with representatives from all units of INE. A Quality Unit is responsible for coordinating tasks in the area of quality. An important feature of the stance on quality is the commitment made by the institutions participating in the PEN to follow the CoP in the statistical operations included in the plan.

INE applies modern statistical methodology and practices which conform in all main respects to the principles of the CoP. INE has participated actively in European and international cooperation and also contributed to the advancement of harmonised methodology and statistical applications at the European level. International and European standards and classifications are applied by INE and the other producers for all the statistical operations included in the PEN.

INE is considered by users to provide extensive and valuable services. The statistics produced and disseminated are said to be objective and impartial, of high quality and reliability. INE has recently renewed and developed its website which is considered to be very rich in content. INE

has also a very good record of providing additional information to users; INE is said to be very accessible and to respond positively to requests for explanations and information on the statistics released as well as requests for custom-made statistics. A specific feature of the user policy is the emphasis INE places on supplying microdata for research and analysis in the form of public use files. They are used extensively by researchers and analysts.

INE has spent considerable effort on promoting statistical literacy. Thus, INE has developed the web portal Explica which is an attractive pedagogical system with the objective to educate users in statistics; increase their understanding of statistics, how statistics are developed and how they can be used. The Explica has a lot of user friendly content for students and the general public such as a series of short videos explaining statistics and developed for the web and for YouTube, and a competition programme for high-school students termed 'Statistical Olympics'. This system has not only found an audience in Spain but also a large audience in Latin America. The Peer Review team considers this a noteworthy contribution to the advancement of statistical literacy.

The Peer Review team learned of several innovative actions and improvements of practices which INE has undertaken in recent years with the objective of enhancing the statistical operations, reducing cost and strengthening compliance with the CoP. Of the innovative practices which have been developed or are under way, mention can be made of the following:

- INE has introduced the application iCalc for communicating with users. This application informs users of the release calendar and all its updates and changes as soon as these are announced, and allows users to integrate the calendar in their own agenda systems.
- INE has been developing a system, UFAES, for focusing samples and reducing sample sizes, both with the objective of reducing cost and reducing response burden of firms in sample surveys (UFAES: Spanish acronym for "Use of Administrative Sources to Reduce Statistical Burden and Costs in Structural Business Surveys").

## **4.2 ISSUES AND RECOMMENDATIONS**

The main finding of the Peer Review is that INE is on the whole compliant with the CoP. The Peer Reviewers have also learned that there have been notable developments in the recent past which have aimed at improving practices and strengthening the degree of compliance. The compliance with the CoP by the other producers of European and national statistics has also been increasing, not least owing to the commitment made by these producers in connection with their participation in the PEN to observe the CoP; however compliance with the CoP is at a somewhat lower level than that of the operations of INE. The Peer Review team has identified a few areas where it considers that the foundations and the practices of official statistics might be improved and brought further in line with the CoP. The team is therefore making several recommendations in this respect. These issues and recommendations are discussed in the following sections.

### **4.2.1 PROFESSIONAL INDEPENDENCE**

As discussed above, both other producers of European and national statistics and the users of INE's statistics have expressed full confidence in the operations of INE and in its professional independence. Thus, the conditions for professional independence as spelled out in the first seven indicators of Principle 1 of the CoP are considered to be fully in place and observed. Meeting with the Peer Review team, some users, however, expressed the opinion that while they

had no doubt of the independence and professionalism of the incumbent and recent Presidents of INE, the legal provisions and practices of appointing and dismissing the President of INE may be considered to entail some risk. They may undermine credibility and may not be fully in line with the eighth indicator of CoP Principle 1. Thus, the current legal provisions may be interpreted as providing an opportunity for political appointment.

The relevant indicator of Principle 1 reads as follows:

“1.8: The appointment of the heads of the National Statistical Institutes and Eurostat and, where appropriate, of other statistical authorities, is based on professional competence only. The reasons on the basis of which the incumbency can be terminated are specified in the legal framework. These cannot include reasons compromising professional or scientific independence.”

The provisions on the appointment of the President of INE are in the statistical law, LFEP, article 28.3, and are as follows:

“The President shall be appointed by the Government under a Royal Decree at the proposal of the Minister of Economy and Finance, and shall be the legal representative of the Institute.”

INE has pointed out that in addition to this, article 5 of the Statutes of INE stipulates that the President of INE has the rank of Under-Secretary in the civil service. (The wording in the English translation may not be quite clear on this as it reads: “The President, Secretary rank is appointed and dismissed by the Government by royal decree on the proposal of the Finance Minister”.) This is of importance as the Law 6/1997 on the Organisational Structure and Functioning of Central Government (LOFAGE) establishes the principles of the ‘professionalisation’ of the General State Administration, under which under-secretaries are high officials with managerial responsibility and shall be appointed from among civil servants for which higher qualification is required. Therefore, according to national law, the President’s appointment is based on professional competence and experience criteria. He/she has the highest administrative status for which the law establishes professional requirements and controls the appointment and removal. It is furthermore stated by INE that according to the LOFAGE every under-secretary is selected from among career civil servants (PhD, Bachelor or equivalent required). Also, that other important laws have a bearing on this, such as the Constitution, the law implementing the Public Employee Basic Statute, and the law 5/2006 regarding conflicts of interest of members of government and of High Officials of the Central Government.

Since the current law on statistics, LFEP, was enacted in 1989, INE has had five Presidents. Their incumbencies have varied between just under four years to just under eight years. The users with which the Peer Review team met were of the opinion that these Presidents have been fully professionally qualified and fully independent, and that their professional conduct has been devoid of any political involvement or consideration. The Peer Review team recognises this and endorses this opinion. On the other hand, the Peer Review team also recognises the view advanced by some users that the current legal requirements may carry a risk for the appointment and removal of the President of INE on other than professional basis. The Peer Review team is fully aware of that the current arrangements and past practices of appointing and dismissing INE Presidents are considered adequate and appropriate by the Spanish authorities. The team is also aware of the fact that practices of appointment and removal from office of heads of NSIs in Europe are not uniform and may differ considerably.

The Peer Reviewers are of the opinion that the existence of the above-mentioned risk associated with the current legislation pertaining to the appointment of the head of INE, would be reduced if the provisions of the CoP were to be taken up in the Spanish legislation. With this in mind and in order to enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 1. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, laying down clear provisions for the appointment and dismissal of the President of the National Statistical Institute, in line with the European statistics Code of Practice (European statistics Code of Practice, indicator 1.8)).**

#### **4.2.2 USE OF ADMINISTRATIVE RECORDS FOR STATISTICAL PURPOSES**

The current Spanish statistical law, LFEP, encourages the use of administrative data for statistical purposes. It also obliges holders of administrative records and registers to assist INE and other national producers of central government statistics with the utilisation of their data. These provisions are fully in line with the CoP, in particular Principle 2 on mandate for data collection, Principle 8 on appropriate statistical procedures, Principle 9 on non-excessive burden on respondents, and Principle 10 on cost effectiveness.

Through tax laws, tax records are, however, exempt from the utilisation of administrative data for statistical purposes. This is explained by the need to observe full confidentiality as regards individual tax data of both firms and households. The ban on the use of tax records for statistics, however, does not apply in the case of the generation of European statistics. Hence, the situation as regards the application of tax records as data for official statistics in Spain differs according to the stated purpose of the use of the ensuing statistics: individual tax records cannot be used for national statistics but they can be used for statistics governed by EU regulations.

In Spain, the four-year PEN, established by a Royal Decree, contains both European and national statistics and the same goes for the annual statistical programmes. It does not seem to make much sense to distinguish between the uses of tax records for these purposes which are not much different. Neither is it logical that confidentiality concerns can cause difference in the application of European and national statistics. This is in particular so as the statistical law 12/1989, LFEP, stipulates full observance and respect of confidentiality as regards individual data for statistical purposes irrespective of the specificities of the statistics produced.

The Peer Reviewers are of the opinion that the legal restrictions on using tax records for national statistics should be abolished and the same access granted to INE to individual tax records for purposes of national statistics as that which applies for European statistics.

In order to strengthen the coordination and efficiency of official statistics and enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 2. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, authorising the National Statistical Institute to access and utilise microdata from tax records for the purposes of compiling all official statistics set out in the National Statistical Plan (European statistics Code of Practice, Principle 2, indicators 8.7, 8.8 and 8.9, Principle 9 and indicator 10.3).**

As discussed above, the statistical law encourages the use of administrative data for statistical purposes and obliges holders of administrative records and registers to assist INE and other national producers of central government statistics with the utilisation of their data. While these provisions are necessary they are not quite sufficient for ensuring efficient and continuous utilisation of administrative data. Two factors can be said to be missing in this respect: a) the owners of current administrative registers used for statistics may decide without warning to change their registers or even discontinue their operations, and b) the design and specifications of the administrative registers may not be suitable for statistical exploitation. This leaves INE and other producers of European and national statistics at a risk as regards the provision of appropriate data. In light of the stipulations of the CoP of utilising administrative data for statistical purposes, the Peer Review team considers it important that this risk of changes in registers, discontinuance of register operations and limitations in the usefulness of the data owing to unsuitable design or specification is limited to the extent possible.

Hence, in order to enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 3. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, making it mandatory for holders of administrative records and registers, which are or may be used for statistical purposes, to inform and consult the Institute on planned changes of the registers and on the design and specifications of registers in order to make them fitter for statistical utilisation (European statistics Code of Practice, Principle 2, indicators 8.7, 8.8, 8.9, and 10.3).**

#### **4.2.3 USE OF CONFIDENTIAL DATA FOR RESEARCH PURPOSES**

The statistical law, LFEP, carries all basic provisions on confidentiality of statistical data. However, there are no explicit provisions on the use of or access to confidential data for analytical and research purposes. Such provisions are present in the current law on European statistics, the Regulation (EC) No 223/2009. In light of the great potential of using confidential data for research and in order to dispel any uncertainty about the legitimacy of such use the Peer Reviewers are of the opinion that it would be desirable to amend the statistical law in this respect. Such an amendment should acknowledge the need for granting researchers access to confidential data, including microdata, and reflect clearly modern practices of facilitating such use for deeper understanding of the economic and social phenomena to which the statistics refer.

In order to enhance the compliance with the CoP, **the Peer Reviewers recommend that:**

- 4. The National Statistical Institute should carry out actions to promote the necessary legislative amendments, authorising the Institute and other producers of official statistics to grant access to confidential data, including microdata, for research purposes and to lay down the main conditions for such access (European statistics Code of Practice, indicator 15.4).**

#### 4.2.4 HUMAN RESOURCES

As other government institutions, INE is facing budgetary and staff restrictions. The budget of INE has been constantly reduced since 2007, and there has been no possibility of staff recruitment since 2010. Despite the reduction of resources, INE has been able to meet its national and international obligations. So far, INE has not had to discontinue or curtail projects to free up resources. Costs savings have been obtained by means of improved management of current expenditure and deferral of some investments. Increase in working time, imposed on all Spanish civil servants, has to some extent made up for losses of staff. An increase in productivity has also been achieved through introduction of more efficient production systems.

Recruiting and retaining qualified staff is a crucial requirement for INE to secure the sustainability of the statistical quality. INE faces two major problems in this respect. Due to disparities in salary levels and in career perspectives, INE frequently loses highly qualified staff mainly leaving INE to fill positions in other government bodies. Those skilled and experienced statisticians are not easy to replace. In addition, for the last five years, INE has had to comply with staff containment rules in the public administration, prohibiting the hiring of new staff to fill positions which become vacant. This includes a ban of hiring staff in order to replace staff members who go into retirement.

As a result of this, many positions are vacant and at the same time an age structure gap has emerged as junior staff are not recruited. The Peer Review team is of the opinion that the recruitment constraints, if persisting, represent a medium and long term threat to INE's capacity to perform its tasks. In addition, the Peer Review team draws attention to the risk that pressure put on staff by the shortages of appropriate human resources may affect working commitment and performance.

Hence, in order to provide adequate human resources for ensuring the continued production of European statistics of undiminished quality, in compliance with Principle 3 of the CoP, **the Peer Reviewers recommend that:**

- 5. The Spanish authorities should lift the temporary freeze on recruitment to allow recruitment of skilled staff at the National Statistical Institute (European statistics Code of Practice, indicator 3.1).**

As it is for every NSI, human capital is the most important asset of INE. Suitable and skilled staff is essential to ensure the production of high quality statistics and to develop more efficient and effective production processes. Proactive human resource management, education and training are essential conditions to attract, develop and retain qualified staff.

INE is well engaged in fostering statistical skills. Its Public Administration School of Statistics<sup>9</sup> (EEAP) provides specific training in official statistics and in disciplines related to statistical production. Courses and seminars are available to INE staff, to employees of the public administration, and to other members of the Spanish statistical community. INE's human resource management unit, which is part of the Secretariat General, takes care of continuous vocational training of INE staff. Attendance of staff to European or international conferences is encouraged, although recently INE has had to contain its allowances to participation in meetings due to budgetary constraints.

---

<sup>9</sup> Escuela de Estadística de las Administraciones Públicas (EEAP)

The Peer Review team notes that state regulations limiting internal mobility impede INE in satisfying staff competence needs. The system put in place by INE to foster the internal mobility of the staff cannot meet the growing need for competence created by staff positions that remain vacant.

INE has carried out one staff opinion survey so far, in 2011. There was an issue expressed by INE about further conducting the survey in a climate of reductions and sacrifices. Discussions held during the Peer Review visit revealed the existence of tensions within INE because of the ever growing demand on employees and the limited capability of the system to propose an attractive career path. In particular, the more recently hired staff members expressed concern regarding their future in INE in the absence of a clear policy for staff promotion.

The absence of office-wide guidelines for evaluating human resources jeopardises the possibility for INE to provide its personnel with opportunities to broaden and deepen their expertise. In addition, drawing up a career plan would benefit from regular interviews between the employee and the manager, providing feedback on work performance. A system of personnel appraisal based on communication with the staff would further allow talent management and ensure that both the career expectations of staff and the needs of the Institute are met.

In the opinion of the Peer Reviewers, the absence of human resource evaluation policy at INE is an obstacle to increasing working performance and harms the full compliance of INE with the principle regarding the effective use of human resources.

In the light of this and in order to enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 6. The National Statistical Institute should organise and implement a system of regular staff appraisal and interviews (European statistics Code of Practice, indicator 10.1).**

#### **4.2.5 INCREASING THE USE OF ADMINISTRATIVE SOURCES**

The Spanish NSS has become increasingly based on the use of administrative data. The statistical law, LFEP, grants all producers of official statistics mandate for the use of administrative data for statistical purposes. The only exception in this respect is that of individual tax records as discussed above. The list of main administrative sources used by INE and other national authorities (ONAs) is impressive and becoming larger each year. There are, however, still great challenges in the creation of a statistical register system; one of them is the organisation for statistical use of an educational register in the Ministry of Education in cooperation with INE, based on information already existing about diplomas or other educational administrative records. Furthermore, coordination and harmonisation of all already existing registers should be strengthened to avoid multiplication and facilitate their linkage.

INE and the ONAs have signed agreements with the most important organisations that own administrative files and provide data for statistics. These agreements set out the purpose of use, the dates on which information is transferred, the register structure and other conditions of collaboration. Such agreements should be signed with all administrative data owners which maintain files used for statistical purposes.

The replacement of traditional questionnaire surveys with administrative data has been one of the most important methods of cost-saving for meeting the reduction of budgets for statistics. Applied more frequently, the practice of using administrative registers ought to ensure further cost reductions as well as alleviation of the response burden, an objective which remains of primary importance.

The four-year national statistical plan, PEN, determines the responsibility of both INE and the ONAs for the statistical processing of administrative data used in the production of European and national statistics. The source of primary information (use of administrative registers) is described in the Inventory of the Statistical Operations maintained by INE. The concrete rules and checks of the quality of administrative data depend on specific use of administrative registers; whether they are used for direct exploitation instead of statistical surveys, for combined use of administrative data and information from surveys, or only to support the data processing from other sources.

INE maintains an inventory of all administrative sources used fully or partially in the production of its statistics and holds a directory of administrative registers only containing information of the name of the registers, the administrative unit in charge of it and its legal basis. The usefulness of the directory would benefit highly from the completion of its content with more detailed information.

As mentioned above, the use of administrative registers in statistical processes is formally set out in the agreements which INE has with the owners of the registers. If any set of administrative data already used by INE may be used for a new purpose, INE informs the managers of the registers about that particular use.

In specific cases such as the Population Census using the population register data or when using data from the Social Security Department, INE draws up special reports on the quality of the administrative sources used and shares them with the owners of the respective administrative data sources. Yet, the analysis of the quality of administrative registers is neither centralised nor systematic and lacks documentation and relevant policy guidelines. There is no formal channel established to provide feedback to administrative data owners about the quality of their data. INE should set up standard procedures and indicators to assess the quality of administrative registers and agree with the data owners on how to process such feedback.

In light of the above and bearing in mind the CoP, **the Peer Reviewers recommend that:**

- 7. The National Statistical Institute and other producers of European statistics should extend and harmonise the use of administrative records through increased utilisation of existing registers, adaptation of registers and creation of new registers for statistical purposes (European statistics Code of Practice, Principles 2 and 3, indicators 6.1, 6.2, 8.7, 8.8, and 8.9, Principles 9 and 10).**
- 8. The National Statistical Institute should elaborate and implement procedures and validation rules for assessing and checking the quality of administrative data. Furthermore, the Institute should put in place arrangements for regular provision of feedback to owners of administrative registers used for official statistics on the quality of the register data (European statistics Code of Practice, indicators 8.4, 8.5, 8.9).**

## **4.2.6 INCREASING THE SECURITY OF MICRODATA**

Statistical confidentiality concerning macro and microdata is adequately covered by the statistical law. Only non-confidential information is made available to all users, but researchers can gain access to confidential microdata under strict conditions. Confidentiality policy is publicly available on INE's website and is overseen by the Statistical Confidentiality Unit and the Security Unit in cooperation with the production units. A Handbook on Statistical Confidentiality is published and used with high degree of professionalism. The most frequently used disclosure methods include global recoding and local suppression for tables and public use files of microdata.

Confidential microdata to be used by researchers and containing detailed confidential information are subject to an anonymisation process. The anonymisation is done so far by using ad-hoc procedures and there are no standard tools adapted to the production processes in INE. The efficiency of the anonymisation would be improved if a general tool was applied.

Fundamental security regulations are set out in INE's Security Policy and involve authorisation, access control, physical security, management of incidents and other aspects of security. Physical access to rooms with equipment supporting information systems requires the use of an electronic card, external servers are isolated from the internal ones, and procedures of registration and authorising users' access to information are checked by the person in charge.

There are database access logs in the mainframe and departmental servers. However, a general tool to register the access by database administrators to databases with confidential content should be introduced. Such traceability tool will exactly detect eventual disclosures.

In order to enhance the compliance with the CoP, **the Peer Reviewers recommend that:**

- 9. The National Statistical Institute should apply standard tools for anonymisation of microdata files for researchers as well as a tool for monitoring access by database administrators to databases with confidential data (European statistics Code of Practice, indicators 5.5 and 15.4).**

## **4.2.7 INVOLVEMENT OF EXTERNAL EXPERTS IN QUALITY REVIEWS**

Quality management is at a very high level in INE. A highly qualified team forms the Quality Unit. The Quality Committee comprises representatives of all INE's units and departments and is subordinated to the Governing Board. The quality guidelines, currently in force, are now under further elaboration and will be based on the Generic Statistical Business Process Model (GSBPM). From 2012, all statistical outputs have been published with quality indicators according to the European statistics metadata standard (ESMS). Tools are available to manage quality in the different stages of the statistical process. User-oriented quality reports are made available to the public through the quality section of INE's website.

A self-assessment of the quality of selected statistical operations in several areas has been carried out at INE. Improvement actions identified are evaluated and analysed to decide on further implementation. The target is to build a systematic self-assessment system to create a complete system of quality reviews throughout the whole organisation.

Continuous quality self-assessment is done by means of internal audit which is mainly carried out by members of the Quality Unit. They have received basic auditing training and should follow specific training in auditing techniques and behaviour. As opposed to the practice in several other areas (such as preparation of the PEN, working groups in several domains, university partnerships), outside experts are not involved in reviewing key statistical outputs. Their deployment in the audits of quality would be very appropriate.

In the light of this and in order to enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 10. The National Statistical Institute should develop and implement a plan to involve external experts in regular reviewing of key statistical outputs (European statistics Code of Practice, indicator 4.4).**

#### **4.2.8 STANDARDISATION OF STATISTICAL PROCESSES**

INE's document "Standard Methodologies for the Statistical Process" outlines the standards used in every stage of the statistical process: planning, sampling, data collection, editing and dissemination. INE's Governing Board decided to adapt this document to the GSBPM. The aim is to apply the GSBPM in all phases of the statistical process which is very desirable.

The same applies to standardisation of tools for the different stages of the business process. INE uses the software CALMAR for calibration; a standard software tool for data collection, IRIA, is used for all types of surveys; the use of the data editing and imputation tool, DIA, is being extended from qualitative to quantitative variables; the application TRAMO-SEATS is used for seasonal adjustment; for encoding classifications INE uses AYUDACOD and AUTOCOD; as standard formats in dissemination INE uses CSV, XLS, XML, PcAxis, JSON SDMX. The Peer Review team finds that INE is well advanced in the development of tool standardisation and encourages INE to continue to pursue this process.

The main frames for business and social/demographic statistics are also standardised at INE. The Spanish business register DIRCE is the crucial infrastructural tool for the production of economic data. There are two frames for household surveys: the Population Census for the labour force survey and the continuously updated Population Register for the remaining surveys

Software tools for assessing and validating source data, intermediate results and statistical outputs are mainly adapted to particular surveys but should be standardised as well. Finally, INE does not have standardised measures of the effects of editing and imputation. Implementation of such measures could contribute to ensuring quality of data sources.

In view of this and in order to enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 11. The National Statistical Institute should intensify its efforts to specify and start applying the Generic Statistical Business Process Model across the statistical production processes and introduce systematic standardisation for the different stages of the statistical production process (European statistics Code of Practice, Principle 4, indicators 7.2, and 12.1).**

## 4.2.9 ISSUES RELATED TO MEETING USER NEEDS

### *Release calendar and pre-release rules*

In its statistical dissemination policy, INE calls for punctuality compliance in the following terms: “Statistics shall be published according to the previously established calendar, and notified to users.”

INE publishes in November of each year a release calendar covering all European and national statistics planned for the coming year. For short-term statistics, an exact date and hour of release (9:00 a.m.) is provided, while for structural statistics, only the exact month is indicated at this stage, with identical hour for all (11:00 a.m.). Exact release dates are published later, two months in advance of the publication: on the last Friday of every month (t), the dates of publication of the structural statistics scheduled for the month (t+2) are announced. The dissemination policy further prescribes not publishing more than three short-term statistics on the same day.

INE has developed interesting means to serve the needs of specific users – especially the media – in terms of release calendar. Journalists receive every week a brief release calendar of the statistics of the coming week that are to be accompanied with a press-release, which is simultaneously posted on the INE website. The media interviewed also welcomed the availability of INE’s release calendar in iCalc format (the application iCalc was introduced by INE for communicating with users), and confirmed their extensive use of this application to merge the release calendar with their own press agenda.

Dissemination of European statistics should respect the principle of impartiality and objectivity according to which all users are treated equitably. In line with the provisions of indicator 6.7 of the CoP reading “any privileged pre-release access to any outside user is limited, controlled and publicised”, INE follows a policy of limiting pre-releases, of maintaining control of their use and of informing publicly who the beneficiaries of this practice are.

The Peer Review team notes that there is as a very strong vote of confidence for the reliability of INE release calendar in comparison to the release calendars of the statistical units of the ministries in general. However, while the dissemination policy states that “Changes to the publications calendar shall be duly justified, and will be made public as soon as possible”, this provision is only partially implemented by INE.

Date and time of all publications are registered through an automatic e-mailing procedure informing users about the release of each new statistics. This practice allows INE to monitor and assess the punctuality of every release. Divergence might occur between the release plan and the real publication date only for structural statistics. In such cases, changes in the initially planned schedule are immediately incorporated in the release calendar and a register of all postponements is kept and made public. However, the reasons for divergences from the pre-announced time are not published. It was reported to the Peer Review team that INE is currently working on a short list of possible causes why statistical releases are delayed, in view of better informing the users on the reasons for the delays. The Peer Review team considers that this slight deviation from indicator 4 of Principle 13 of the CoP on timeliness and punctuality should be addressed by INE. In order to enhance compliance with the CoP, **the Peer Reviewers recommend that:**

- 12. In its announcements of delayed publications, the National Statistical Institute should include explanations of the reasons for the divergence from the release calendar (European statistics Code of Practice, indicator 13.4).**

#### *Accessibility of microdata*

All users, media and researchers met during the Peer Review visit expressed an impressive degree of satisfaction of the way in which INE releases data on its website and about the relevance of this data. The ease of access to INE staff and the availability of statisticians to provide clarifications on demand were also quoted as outstanding.

On the website of INE, a large set of anonymised and secured microdata files from registers and surveys is made available, some of them providing long time series such as the vital statistics going back to 1975. Representatives from academic institutions declared themselves well served with INE's release of the public use files; these are used quite intensively with some 25,000 downloads each year. In addition to these services, researchers would appreciate access to more detailed level of microdata than available in these public use files. In order to meet that demand, INE has put in place specific tools to further serve its users' needs for confidential data access. Thus, INE operates a secured safe centre where researchers, under very strict conditions of respecting disclosure rules before release, can access microdata files. Researchers are allowed to produce their own results which are checked by INE staff for ensuring that there is no breach of confidentiality. There are now three computers available at INE headquarters to provide researcher access to confidential data. If researchers demand such access from any of the regional offices of INE, the necessary arrangements are made for providing it.

The arrangements described above are not sufficient to meet users' demand or CoP indicator 15.4 on access to microdata as INE has not put in place facilities for remote access to confidential microdata. The Peer Reviewers are of the opinion that this represents an issue for INE's attention.

Hence, in order to facilitate research and enhance the compliance with the CoP, **the Peer Reviewers recommend that:**

- 13. The National Statistical Institute should develop and implement remote access to microdata for research purposes and lay down specific protocols for such access (European statistics Code of Practice, indicator 15.4).**

#### **4.2.10 COMPLIANCE WITH THE CODE OF PRACTICE BY OTHER NATIONAL AUTHORITIES**

Apart from INE, the NSS of Spain includes, as outlined above, several other national authorities (ONAs) producing European statistics: Ministry of the Treasury and Public Administration Services; Ministry of Home Affairs; Ministry of Public Works; Ministry of Education, Culture and Sport; Ministry of Employment and Social Security; Ministry of Industry, Energy and Tourism; Ministry of Agriculture, Food and Environmental Affairs; Ministry of Economic Affairs and Competitiveness; and the Bank of Spain. The organisation of statistical work of the ONAs is highly varied; some of them have their own statistical units, at others statistical activity is scattered across several divisions or is virtually non-existent. The capacity of the ONAs for statistical work varies considerably and has suffered from staff and budget restrictions in recent years.

While the statistical operations of the ONAs appear to be carried out in a professionally independent manner in line with the PEN, it is clear from the Peer Review discussions with users that in general the ONAs enjoy less credibility than INE. One major reason is that statistical press releases are issued by the different ministries as such rather than by their statistical units. This practice gives rise to speculation about the statistical content and doubts about the objectivity and impartiality of the statistical results. For this reason, the Peer Reviewers are of the opinion that all statistical releases of the ONAs should to the extent possible be the task of the statistical units or divisions, clearly separated from the politics of the day and devoid of any subjective interpretation.

The main coordination tool for the whole NSS is the PEN, which embraces all European and national official statistics produced by INE and the ONAs. All the ONAs have a release calendar, based on the PEN, but usually not with exact dates, announcing only the month of release or no-later-than dates. This practice should be changed and the release calendars of ONAs should show exact release dates. Adherence to the release calendars should be monitored and changes in release dates published in advance and explained. Furthermore, INE should set up systematic control of the transmission of statistical information to European institutions by all ONAs.

Both documentation and practices of the ONAs regarding the treatment of errors and handling of revisions seem quite varied and generally weaker than INE's practices. This should be improved in cooperation with INE. ONAs are also encouraged to conduct user satisfaction surveys in order to assess the perception of users of the relevance and quality of their statistics.

In order to strengthen the credibility of European statistics and enhance the compliance with the CoP, the Peer Reviewers recommend that:

**14. The statistical entities of the different ministries in Spain should take the following actions:**

- **Assume sole responsibility for the press releases and publication of their statistical outputs (European statistics Code of Practice, indicator 1.6 and Principle 6).**
- **Bring their release calendar practices fully in line with the Code of Practice (European statistics Code of Practice, Principles 13 and 15).**
- **Adopt and publish clear procedures for the handling of errors and revisions (European statistics Code of Practice, Principle 12).**

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

The report does not diverge in any major issue from INE's own assessment of its compliance with the ESS CoP. However, with regard to recommendation 1 on the professional independence which states:

"The National Statistical Institute should carry out actions to promote the necessary legislative amendments, laying down clear provisions for the appointment and dismissal of the President of the National Statistical Institute, in line with the European statistics Code of Practice (European statistics Code of Practice, indicator 1.8)".

INE Spain would like to point out that any legislative amendment should have been made in line with the EU legislation in force, and not only with the European Statistics Code of Practice. Therefore, we would have preferred that the recommendation had included such a reference.

INE would like to express its appreciation for the work done by the Peer Review team, for the open and constructive discussion during the visit and for valuable recommendations provided.

## 5. ANNEX A – AGENDA OF THE PEER REVIEW VISIT

### PEER REVIEW VISIT TO SPAIN

17 – 21 NOVEMBER 2014

#### AGENDA

To be held in: INE Paseo de la Castellana, 183 28071 – Madrid- **10th Floor, Room: 1039** (Except for meetings 7 and 14 which will take place in the 1st Floor, room 120)

**Peer Review team (PR Team)**  
**Hallgrímur Snorrason**, Chair  
**Isabelle de Pourbaix**, Reviewer  
**Jan Matejcek**, Reviewer

**Eurostat Observer**  
**John Allen**, Head of Social statistics  
 – modernisation and coordination  
 Unit

**National Coordinator Team**  
**Agustín Cañada**, (PR National Coordinator) Director. Head of the Quality Unit (UC)  
**Asunción Piñán**, Head of area, Quality Unit  
**Luisa Muñoz**, Head of area, Quality Unit  
**Celia Santos**, Head of area, Quality Unit  
**María González**, Technical Assistant, Quality Unit  
 (+ Peer Review Coordination Group)

Time	Programme	Participants
<b>Day 1 – Monday, 17 November 2014</b>		
<b>From-To</b>	<b>Subject</b>	<b>Name, position</b>
09.00 – 10.00	- 1 Peer Review Team internal meeting	PR Team
10.00 – 10.45	- 2 Preparatory meeting with the NSI coordinator team and, possibly, other national participants in the visit to discuss practical aspects of the visit.	Agustín Cañada, Asunción Piñán, Luisa Muñoz Celia Santos, María González
10.45 – 11.00	- Break	
11.00 – 13.00	- 3 Welcome and introduction of the programme. General information session: description on how the NSS is organised. Statistical Plans. (Including a presentation on NSS organisation and the new four-year Stat. Plan)	Miguel A. De Castro, Alfredo Cristóbal, Antonio Salcedo, Providencia Núñez, Agustín Cañada, Luisa Muñoz, Celia Santos
13.00 – 14.00	- Lunch	
14.00 – 15.00	- 4 Statistical legislation and related legislation (CoP principles 1, 2, 5 and 6)	Carlos Ballano, Providencia Núñez, Ana C. Saura, Yolanda Gómez, Adolfo Gálvez, Alicia Fernández, Agustín Cañada, Luisa Muñoz, Celia Santos
15.00 – 15.30	- 5 Resources and cost effectiveness (CoP principles 3 and 10)	Carlos Ballano, Natividad Domínguez, Agustín Cañada, Luisa Muñoz
15.30 – 17.00	- 6 Coordination role of the NSI.	Miguel A. De Castro, Pilar Gómez, Providencia Núñez, Ana López, Ana C. Saura, Yolanda Gómez, Agustín Cañada, Luisa Muñoz
<b>Day 2 – Tuesday, 18 November 2014</b>		
09.00 – 11.00	- 7 Meeting with main users – Ministries and other public/private institutions	Carlos Casado, M <sup>a</sup> Dolores García, Carlos Martín, Raúl Mínguez, Javier Muñoz, Juan Peñalosa, Edita Pereira, Carmen Vizcaya, Agustín Cañada, Luisa Muñoz, Celia Santos
11.00 – 11.15	- Break	
11.15 – 13.00	- 8 Quality and statistical Processes (CoP principles 4 and 7-9). Including a presentation of INE's Quality management System.	Carlos Ballano, Miguel A. Martínez, Agustín Cañada, Asunción Piñán, Luisa Muñoz, Celia Santos, María González

13.00	-	Lunch	
14.00			
14.00	- 9	Statistical output (relevance, accuracy and reliability, coherence and comparability, CoP principles 11-15)	Carlos Ballano, Miguel A. Martínez, Agustín Cañada, Asunción Piñán, Luisa Muñoz, Celia Santos, María González
15.00			
15.00-16.00	10	Dissemination (timeliness and punctuality, accessibility and clarity)	Adolfo Gálvez, María J. Vinuesa, Agustín Cañada, Asunción Piñán, Luisa Muñoz, Celia Santos, María González
<b>Day 3- Wednesday, 19 November 2014</b>			
09.00	- 11	Meeting with main data providers/respondents	Ana Ceballo, Edita Pereira, Carmen Vizcaya, Carlos Ballano, Agustín Cañada, Celia Santos
10.30			
10.30	-	Break	
11.00			
11.00	- 12	Meeting with academia, researchers etc.	Carmen Nieto, Diego Ramiro, José Luís Zofío, Agustín Cañada
12.30			
13.00	-	Lunch	
14.00			
14.00-14:45	13	Cooperation/level of integration	Antonio Salcedo, Ana C. Saura, Yolanda Gómez, Agustín Cañada, Luisa Muñoz
14.45	-	Break	
15.00			
15.00	- 14	Meeting with other producers	Paloma Seoane, Jesús Ibáñez, Carmen Ureña, Rafael Roig, José Luis Rodríguez, Agustín Cañada, Celia Santos
16.30			
<b>Day 4- Thursday, 20 November 2014</b>			
09.00	- 15	Meeting with junior staff	Cristina Brís Ruano, Ana Cánovas Zapata, María De Blas Portero, María Elisa Esteban Segurado, Rosario González García, Ana Cecilia Lorente Morata, Marina Pérez Julián, Carmen M Pirla Belio, David Salgado Fernández, María Santana Álvarez, Carlos Valero Rodriguez
10.30			
10.30	-	Break	
11.00			
11.00	- 16	Meeting with media	Macarena Baena, Paul Day, Raquel Díaz, Agustín Cañada, Ana C. Saura, Donald Peña
12.30			
13.00	-	Lunch	
14.00			
14.00	- 17	Clarifications, remaining or additional issues and focus areas	Miguel A. De Castro, Carlos Ballano, Miguel A. Martínez, Agustín Cañada, Luisa Muñoz, Celia Santos
15.00			
<b>Day 5- Friday, 21 November 2014</b>			
09.00	- 18	PR team discussion	PR Team
11.00			
11.00	- 19	Meeting with senior management: conclusions and recommendations	Gregorio Izquierdo, Miguel A. De Castro, Alfredo Cristóbal, Carlos Ballano, Adolfo Gálvez, Miguel A. Martínez, Antonio Salcedo, Agustín Cañada
13.00			
13.00	-	Lunch	
14.00			
14.00	- 20	Preparation of the report: task sharing	PR Team
15.00			

## 6. ANNEX B – LIST OF PARTICIPANTS

	<b>Peer Review team</b>
1	Mr Hallgrímur Snorrason, Chair
2	Ms Isabelle de Pourbaix, Reviewer
3	Mr Jan Matejcek, Reviewer
	<b>Eurostat observer</b>
4	Mr John Allen, Head of Social statistics – modernisation and coordination Unit
	<b>National Coordination Team</b>
5	Agustín Cañada Martínez (*), Director, Head of the Quality Unit (UC)
6	Luisa Muñoz Gonzalez, Head of area, Quality Unit
7	Celia Santos Sánchez, Head of area, Quality Unit
8	Asunción Piñán Gaviria, Head of area, Quality Unit
9	María González de Zulueta, Technical Assistant, Quality Unit
	<b>INE (*) Members of the Peer Review Coordination Group (GCPR)</b>
10	Gregorio Izquierdo Llanes, President of NE
11	Miguel De Castro Puente (*), Director General of Planning and Production control
12	Alfredo Cristobal Cristobal (*), Director General of Statistical products
13	Antonio Salcedo Galiano (*), Director, Office of the President
14	Carlos Ballano Fernandez (*), Director, Responsible of Planning and Production control
15	Adolfo Gálvez Moraleda (*), Director, Responsible of Statistical dissemination
16	Miguel A. Martínez Vidal (*), Director, Responsible of Methodology and statistical production development
17	Donald Peña Martínez, Responsible of press office
18	Ana Carmen Saura Vinuesa, Deputy Director, Office of the President
19	María J. Vinuesa, Deputy Director, Statistical dissemination
20	Pilar Gómez Rodríguez, Deputy Director, Planning and Production control
21	Natividad Domínguez Calaveras (*), Director, General secretariat
22	Providencia Núñez Gonzalez (*), Head of area, Planning and Production control
23	Ana López Lago (*), Head of area, Planning and Production control
24	Yolanda Gómez Menchón (*), Legal Adviser, Office of the President
25	Alicia Fernández Sanz, Head of area, Statistical Dissemination

	<b>INE – Junior staff</b>
26	Cristina Brís Ruano, Tourism Statistics
27	Ana Cánovas Zapata, Office of the President
28	María De Blas Portero, Sampling Unit
29	María Elisa Esteban Segurado, Data collection Unit
30	Rosario González García, Social statistics
31	Ana Cecilia Lorente Morata, Statistical Dissemination
32	Marina Pérez Julián, Labour market statistics
33	Carmen M Pirla Belio, Structural Business statistics
34	David Salgado Fernández, Methodology Unit
35	María Santana Álvarez, Statistical Dissemination
36	Carlos Valero Rodriguez, National Accounts
	<b>Other Producers (ONAs)</b>
37	Paloma Seoane Spiegelberg, Ministry for Agriculture, Food and Environment, Director of the Sub-directorate General for Statistics
38	Jesús Ibáñez Milla, Ministry of Education, Culture and Sport, Director of the SG for Statistics and Studies
39	Carmen Ureña Ureña, Ministry of Education, Culture and Sport, Deputy Director of the SG for Statistics and Studies
40	Rafael Roig Rambla, Ministry of Finance and Public Administrations, Head of Custom Statistical Unit, Department of Customs and Special Taxes
41	José Luis Rodríguez Quirós, Ministry of Finance and Public Administrations, Assistant to the Head of Unit
	<b>Main users</b>
42	Juan María Peñalosa Ruiz, Bank of Spain, Director, Statistics Department
43	Javier Muñoz Carabias, Ministry of Industry & Energy and Tourism, Director of the SG for Studies, Analysis and Action Plans
44	M <sup>a</sup> Dolores García, Ministry of Finance and Public Administration , Institute of Fiscal Studies, Economic Research
45	Carlos Casado Valera, Madrid Autonomous community, Director General of Economic Studies and Statistics
46	Edita Pereira Onil, CEOE, Business organization, Head of Economic Research Unit
47	Raúl Mínguez Fuentes, High Council of the Chambers of Commerce, Industry and Navigation, Directorate of strategy and analysis
48	Carlos Martin Urriza, CCOO Trade Union, Head of Economic Research Unit

	<b>Main data providers/respondents</b>
49	Carmen Vizcaya León, CEOE, Economist at the Economic Research Department
50	Edita Pereira, CEOE, Business organization, Head of Economic Research Unit
51	Ana Isabel Ceballo Sierra, General Association of Consumers (ASGECO), President of the General Association of Consumers
	<b>Academia/ researches</b>
52	José Luís Zofío Prieto, Faculty of Business and Economics, Universidad Autónoma de Madrid (UAM), Professor of Foundations of Economic Analysis, Director of the Economic Analysis Department
53	Carmen Nieto Zayas, Faculty of Statistics, Universidad Complutense of Madrid (UCM), Dean of the Faculty of Statistics and Professor of Statistics and Operational Research
54	Diego Ramiro Fariñas, Spanish National Research Council (CSIC), Institute of Economy, Geography and demography, Senior Scientist at CSIC
	<b>Media</b>
55	Macarena Baena, Agencia Efe, Journalist
56	Paul Day, Correspondent Spain, Thomson Reuters, Journalist
57	Raquel Díaz Guijarro, Cinco Días, Journalist