

PEER REVIEWERS' RECOMMENDATIONS AND *INSEE*¹ IMPROVEMENT ACTIONS IN RESPONSE TO THE RECOMMENDATIONS

Peer reviewer's recommendations and improvement actions in response to the recommendations

- 1. Appropriate legal and/or institutional measures should be taken to explicitly empower the National Institute for Statistics and Economic Studies and the Ministerial Statistical Departments to undertake their mandates in respect of the development, production and dissemination of statistics in a professionally independent manner. (European statistics Code of Practice, indicator 1.1)
- 2. The Director General of the National Institute for Statistics and Economic Studies and, where appropriate, the Directors of the Ministerial Statistical Departments should be assigned the sole responsibility for deciding on statistical methods, standards and procedures, and on the timing and content of statistical releases. (European statistics Code of Practice, indicator 1.4)
- 3. Greater transparency should apply in the processes governing the appointment and removal of the Director General of the National Institute for Statistics and Economic Studies and that the reasons for terminating an incumbency should be specified in law. (European statistics Code of Practice, indicator 1.8)
- 4. Appropriate legal and/or other mechanisms should be put in place to ensure that the National Institute for Statistics and Economic Studies and the Ministerial Statistical Departments are consulted so that the needs of official statistics are taken into account when administrative data systems are being developed or reviewed. (European statistics Code of Practice, Principle 2 and indicator 8.7)

Current situation:

In its first article, the French law on statistics states that "the conception, production and dissemination of official statistics are carried out in full professional independence". The National Statistical Governance Advisory Board (in French: "Autorité de la Statistique Publique") created on 4 August 2008 ensures the independence needed for the national statistical system to remain wholly impartial.

The INSEE Director General is appointed by a decree issued by the Council of Ministers, which is the most solemn form of such regulatory decisions. The appointment is made by the executive branch of government, and is given extensive coverage in the press. The Director General appointment — like all directors-general in the administration — may only be terminated by decision of the Council of Ministers.

INSEE and the Ministerial Statistical Departments are responsible for ensuring that their statistics are produced and disseminated in an independent manner, each in their respective fields. They are responsible for methods, standards and procedures, within the framework approved by the Quality Label Committee. The National Statistical Governance Advisory Board oversees compliance with the principle of professional independence in the conception, production and publication of official statistics.

An amendment to the basic legislation on official statistics in France (Law n°51-711 of 7 June 1951) allowed for information collected by administrations, public legal entities or private entities managing public services to be supplied to INSEE or the Ministerial Statistical Departments at the request of the Minister for the Economy, after consultation of the CNIS and unless stipulated to the contrary by current legislation. This information may only be used for official statisticians in their productions. INSEE or Ministerial Statistical Departments access to this administrative data is governed by contracts between the owners of the data and the body in charge of the production.

Till the regulation n°223/2009 is officially revised, France is in line with European laws. The revision of the regulation n°223/2009 will result in the implementation of the new provisions in the French law. The new regulation gives new opportunities in defining the coordination of the national statistic system, the mechanisms ensuring the independence of the NSI and the ONAs and the implementation of the quality policy.

Improvement action 1-4: Implementation of the revision of regulation 223/2009

France will implement the revised 223/2009 regulation in the coming months. This will solve most shortcomings listed above:

- The revised definition of professional independence -article 2(1) point (a) of the revised 223/2009 combined with article 5a(1) ensuring professional independence of officials responsible for the tasks set out in the regulation shall solve recommendation 1.
- Recommendation 2 will be taken into account through the provisions of articles 2(1) point a and 5a(1) reinforced by 5a(2) in the case of the head of the NSI.
- Article 5a (4) deals with transparent recruitment/ appointment and guarantees that the reasons for dismissal or transfer do not compromise professional independence. It aims to the same objectives as recommendation 3.
- Article 17a (2) aims explicitly at recommendation 4 as far as INSEE is concerned. As the national statistical coordinator, INSEE will take on board the coordination of Ministerial Statistical Departments.

Timeline:

The timeline is not in the hands of the French NSI. The adoption of national legal measures - in particular a revision of the French statistical law might require some time. 2016 Q IV seems a reasonable deadline.

5. Necessary legal measures should be taken to enable the National Institute for Statistics and Economic Studies and the Ministerial Statistical Departments to use data held by private entities. (European statistics Code of Practice, indicator 2.2)

Current situation:

The French statistical law empowers official statistical surveys to collect information held by private entities about themselves. However, this is much more complicated when this information relates to third parties and is actively managed in specific information systems, like for instance databases on cashier data or telephony databases. In these cases, the legal framework is complex: these databases may be regarded as protected by laws on intellectual property rights, whereas their contents - individual data - may not. This issue is emerging as an important topic due to the new interest for the use of "big data".

Improvement action 5: Access to data held by private entities

The French National Statistical Advisory Committee and NSI launched a few months ago a working group on the use of data held by private entities. A modification of the law on official statistics in France (Law n°51-711 of 7 June 1951) is intended. The working group is currently defining consensus with the business representatives and will propose a precise legal framework for the access and the use of such data held by private entities.

Timeline:

The legislative vehicle that would introduce this modification of the law on official statistics should be at first reading in Parliament before the end of 2015.

6. The current French statistical legislation covering the guarantee of statistical confidentiality, which envisages the automatic disclosure of confidential data for criminal prosecution and heritage (national archive) purposes, should be reviewed to align it with the corresponding European Union legislative provisions. (European statistics Code of Practice, Principle 5)

Current situation:

Statistical confidentiality as defined by the 223/2009 regulation that is not subject to any exception differs from the statistical confidentiality rule defined by the French statistical law, in which confidentiality is mitigated with other democratic principles such as for instance the right of an accused to a fair trial and therefore the use of any relevant piece of information by the investigating judge.

Improvement action 6: Strengthening statistical confidentiality in criminal prosecution and heritage legislation

The French statistical law should be revised so as to be consistent with European law. This will be done when inserting new provisions related to the revision of 223/2009 regulation.

Timeline:

2016 Q IV is targeted but subject to further adjustment.

7. The arrangements for pre-release and embargoed access to statistical releases throughout the French Statistical System should be reviewed to align them more closely and uniformly with the European statistics Code of Practice. (European statistics Code of Practice, Principle 6)

Current situation:

INSEE practices fully comply with the Code of Practice and the IMF's SDDS guidelines.

The Consumer price index, the quarterly national accounts (preliminary figures and detailed figures), the International Labour Organisation (ILO) unemployment and the salaried job figures are disseminated at 7:30 am. The other key indicators - published in the collection "Informations Rapides" - are disseminated at 8:45 am. The economic indicators are reported under embargo the day before the publication, at 6:00 pm, to the offices of the President of the Republic, the Prime Minister and of the Minister responsible for economy. The objective is to give them some time to prepare the official communication of the government.

The key indicators are then disseminated mainly through the website www.insee.fr at the exact time of the embargo lifting. Only journalists from news agencies receive the information under embargo by fax or email, 15 minutes before the schedule of dissemination. The journalists from broadcast and print media receive it by email at the embargo lifting. These principles also apply to other indicators (non-major indicators) whose dissemination is set at 12:00 am. For these other indicators, only journalists from news agencies receive the information in advance under embargo by fax and e-mail at 11:45 am. The objective is to give them some time to analyse the statistics and allow them to provide well-documented feeds for newspapers.

However, among ONAs the embargo practices may vary and, in some cases, national economic indicators may be pre-released to the cabinet of their ministry up to 5 calendar days before the public dissemination date. This is not the case of European primary statistics. While the independence of ONAs and the leak risks are strictly followed and assessed by the French National Statistical Governance Advisory Board (in French: "Autorité de la Statistique Publique"), the image of official statistics would greatly benefit from more homogeneous practices and shorter pre-releases times.

Improvement action 7: Embargo's rule in the ONAs

In order to improve the coordination of the French national statistical system and to strengthen the identity of official statistics, all the ONAs will progressively align with the INSEE embargo rule for the European statistics and make this rule public.

As part of its forthcoming coordination's role in terms of dissemination rules, INSEE may in close cooperation with French NSGAB monitor the implementation of the recommendations through the Statistical Program Committee where the various components of the official statistical system regularly meet.

Timeline:

2017 Q IV: all the ONAs comply with INSEE pre-releases practices for European statistics

- 8. The National Institute for Statistics and Economic Studies should develop further its vision, and related integrated and systematic implementation strategy and framework, for embedding quality management throughout the national statistical system. (European statistics Code of Practice, Principle 4)
- 12. The National Institute for Statistics and Economic Studies should build on its existing practices and put in place a systematic programme, and corresponding organisational arrangements, to undertake regular reviews of all statistical surveys and outputs. (European statistics Code of Practice, indicator 4.3)
- 13. The National Institute for Statistics and Economic Studies should put in place mechanisms to align and integrate the quality management related tasks undertaken by the General Inspectorate, the Directorate for Methodology and Statistical Coordination and International Relations and other departments and committees within the Institute as well as by the Official Statistics Quality Label Committee. (European statistics Code of Practice, indicators 4.1 and 4.4)

Current situation:

In 2006, INSEE introduced a quality action plan which is monitored by a unit at head office. The plan is designed to improve the quality of statistics produced by INSEE. It comprises a quality improvement action plan, part of which is monitored by Eurostat in terms of compliance with the European Statistics Code of Practice. At the end of 2007, a comparable quality action plan was introduced for the Ministerial Statistical Departments.

For household surveys, all the different stages in the production process are set out in a "Cadre organisationnel de réalisation d'enquête" (CORE - Organisational framework for Carrying out Surveys). This document is written up and validated by all those involved in carrying out the survey. It evolves and is updated as the various stages progress, and is an essential tool for survey management. A quality assurance framework has recently been designed to supplement the CORE. It is gradually expanded. The project management methods used at INSEE include a quality assurance plan designed to ensure the compliance and maintainability of software and other IT applications.

Internal audits are carried out by the INSEE general inspectorate. Each assignment of the general inspectorate corresponds, whenever possible, to one of the following cases: evaluations to prepare changes, evaluations to guide relations between INSEE and its partners, or audits of a procedure, a unit or a statistic. The role of the general inspectorate is to monitor and alert. The Quality Label Committee examines survey projects, checking among other things on the quality of the project and the ability of the department conducting the survey to guarantee sufficient quality criteria. Since 2005, its role has been enhanced and extended to include the statistical processing of administrative files.

The revision of the regulation n°223/2009 will result in the implementation of the new provisions in the French law. The new regulation gives new opportunities in defining the coordination of the national statistic system, the mechanisms ensuring the independence of the NSI and the ONAs and the implementation of the quality policy. Furthermore INSEE has launched in 2014 a redesign of its long-term business plan, including the definition of a more integrated quality framework.

Improvement action 8/12/13: Strengthening INSEE quality policy

INSEE will, step by step, develop a Quality Assurance Framework for the French National Statistical System. This QAF will progressively cover all aspects and domains of the statistical production. It will define the quality criteria and the follow-up procedures, especially regarding the validation phase and the risk assessment, and will be based on an analysis of the processes relying on international works on Enterprise Architecture.

Statistical producers will have to conduct self-assessment reviews with the help of the Quality unit; the results of these reviews will be regularly presented in Executive committee meetings and will be used as input for the development of INSEE QAF. Every new project which aims at redesigning a statistical process will have to produce a QAF as a deliverable.

Timeline:

2015 Q II: beginning of the QAF development 2017 Q IV: the QAF is implemented at INSEE

2018 Q IV: the QAF is implemented in at least 50% of the ONAs

2019 Q IV: the QAF is implemented in all the ONAs

9. The National Institute for Statistics and Economic Studies should develop further its system to report product quality to users on a regular basis based on the European standard quality criteria. (European statistics Code of Practice, indicator 4.3)

Current situation:

When surveys are processed by INSEE or by a Ministerial Statistics Department, detailed quality reports are prepared for internal use, using national models. These quality reports provide a review of the survey, information to assess the level of dissemination of the results, and indications for improving the subsequent survey. Among other things, the standard report includes items from evaluations proposed by Eurostat. The aim of INSEE and the Ministerial Statistics Departments is to routinely apply quality reporting to all surveys.

Initially intended to improve production processes, survey quality reports are progressively being placed at the disposal of the public in a simplified version, named user oriented quality report, to inform the public of the quality of the results.

Today, many user quality reports are available on INSEE website ("Sources et méthodes" page, http://www.insee.fr/fr/methodes/default.asp?page=sources/liste-sources.htm) and ONAs websites. Report models, although similar to European models, do not totally comply with Eurostat guidelines and would be further standardised.

Improvement action 9: Adoption of European standards for quality reports

In order to fully comply with European standards and to facilitate the interpretation of users quality reports, INSEE will progressively adopt the Eurostat models (i.e. ESMS, ESQRS, SIMS or a model linked to a specific regulation). The European models will be used both for producer and user quality reports, this will lead to a more standardised and streamlined reporting process.

Timeline:

2017 Q IV : all the quality reports available on INSEE website use the European models

10. The National Institute for Statistics and Economic Studies should continue to develop its metadata system on the basis of European standards. (European statistics Code of Practice, indicator 15.1)

Current situation:

INSEE has developed an application to manage and organise its metadata. It is used to describe processes and products and to store quality reports and classifications. This application provides powerful functions and fulfils the role of a metadata repository but many evolutions occurred since it was designed, especially in the domain of international metadata standards (INSEE repository uses national standards) and an overhaul of this repository is currently on going in the project called RMéS.

The future metadata repository will use international standards and will facilitate the flow of metadata through the complete lifecycle of statistical products. Furthermore the repository will implement the mechanisms of "active metadata", allowing for the description of questionnaires with the DDI format.

Improvement action 10: Overhaul of the metadata repository

The completion of the RMéS project will totally implement this recommendation. RMéS roadmap includes four parts: concepts, classifications, statistical processes, and products.

Timeline:

2016 Q II: concepts and classifications repositories are completed

2017 Q III: the RMéS project is completed

11. The National Institute for Statistics and Economic Studies should develop and publish comprehensive documentation and methodological guidelines for the French Statistical System based on European and other international standards, guidelines and good practices while taking into account the existing common statistical culture that prevails throughout the System. (European statistics Code of Practice, indicator 7.1)

Current situation:

The Institute defines the concepts, methods and classifications applied throughout the official statistical system. It actively takes part in elaborating international and European standards. The general methodological guidelines are designed and disseminated by the Statistical Methods Division. These guidelines are designed taking into account international standards, academic literature and good practices. When tools developed by the international community are available and used at INSEE, handbooks and training are provided.

The Statistical Methods Division publishes documentation covering all methodological domains on INSEE intranet. Some general methodological guidelines are published on INSEE website, but the documentation is spread out and not comprehensive. For specific statistical processes, INSEE informs its audience of the methods used to design and produce statistical data in books, such as INSEE Methods, or Working Papers.

INSEE uses standardized models for metadata and quality reporting. These models are available internally and used for producing the reports disseminated to users but they are not published on INSEE website.

Improvement action 11: Methodological guidelines

INSEE will publish a comprehensive methodological documentation on a dedicated section of the website (methods and associated tools: sampling, confidentiality, seasonal adjustments methods, quality assurance frameworks, quality reporting models etc.).

Timeline:

2016 Q III

14. The user-oriented quality reports and metadata files for all official statistics should be published on the websites of the National Institute for Statistics and Economic Studies and the Ministerial Statistical Departments as a matter of course. (European statistics Code of Practice, indicators 15.1 and 15.5)

Current situation:

When surveys are processed by INSEE or by a Ministerial Statistics Department, detailed quality reports are prepared for internal use, using national models. These quality reports provide a review of the survey, information to assess the level of dissemination of the results, and indications for improving the subsequent survey. Among other things, the standard report includes items from evaluations proposed by Eurostat. The aim of INSEE and Ministerial Statistics Departments is to routinely apply quality reporting to all surveys.

Initially intended to improve production processes, survey quality reports are progressively being placed at the disposal of the public in a simplified version, named user oriented quality report, to inform the public of the quality of the results.

Today, many user quality reports are available on INSEE website and ONAs websites.

Improvement action 14: Quality reports

Publish an annual quality report and a metadata file for all European statistics. The recommendation will be implemented consistently with the implementation of recommendation 9.

Timeline:

2017 Q III: at least 50% of the European statistics have an up-to-date quality report and metadata file.

2018 Q III: at least 75% of the European statistics have an up-to-date quality report and metadata file.

2019 Q III: 100% of the European statistics have an up-to-date quality report and metadata file.

15. A Revisions policy for official statistics should be prepared and published on the National Institute for Statistics and Economic Studies' website. (European statistics Code of Practice, indicators 6.6 and 8.6)

Current situation:

The data series (surveys, national accounts...) are revised to take account, for example, of the latest survey results or more recent sources. Some official statistics (like national accounts or quarterly results of the labour force survey), have a public documentation on revision policy, but not all official statistics have an explicit revision policy publicly available. Furthermore the documentation on revision is not standardised nor centralised in a specific section of INSEE website.

Improvement action 15: Make public the revision policy

A new "Revision policy" section will be added on each "Sources and Methods" page of the website.

Timeline:

2016 Q IV

16. The National Institute for Statistics and Economic Studies should endeavour to streamline the procedures for approving access to microdata through the Secure Remote Access Centre for researchers so that access can be approved faster than the current 3 to 6 months. (European statistics Code of Practice, indicator 15.4)

Current situation:

The Secure Remote Access Centre (CASD) enables researchers to work on individualized and very detailed data, which, due to its confidential nature, requires optimal security conditions. It provides high security constraints, interfaces and tools that enable researchers to work in excellent conditions.

For data collected by the public statistical system there is a standard access process to the data sources, which requires obtaining an approval issued by the French Statistical Confidentiality Committee. Currently a 3 to 6 month delay is not uncommon in order to obtain this approval. Such a delay can hinder the achievement of projects.

Improvement action 16: Access to micro-data through the CASD

INSEE will initiate negotiations with the Committee for Statistical Confidentiality about processing times for requests. The process will be streamlined as much as possible however processing times will not be shortened unless statistical confidentiality is guaranteed.

Timeline:

2015 Q III: INSEE will initiate negotiations with the Committee for Statistical Confidentiality. Further investigation is needed for a tentative timetable.

17. The National Institute for Statistics and Economic Studies should provide clarification through its website of the different types of microdata and access available through the facilities at the Secure Remote Access Centre, the Centre Quetelet or directly through the National Institute for Statistics and Economic Studies' website. (European statistics Code of Practice, indicators 15.2 and 15.4)

Current situation:

There are three kinds of micro-data: anonymized files for public use, low risk files for scientific use and confidential files. The INSEE website provides anonymized files for public use, the Centre Quetelet provides anonymized files and low risk files mainly to registered researchers whereas the Secure Remote Access Centre (CASD) provides access to confidential files to duly authorized researchers. The sources catalogues are available on the websites of the three institutes and the descriptions of the access process are available on the Centre Quetelet and Secure Remote Access Centre websites.

The official INSEE website does not explicitly address the different types of data and associated procedures. Without a summary of the different types of data available, potential users of micro-data may not be aware of the data available and the facilities where they are provided.

Improvement action 17: Documentation about the three types of micro-data

Information on the specific access procedures for each kind of data, a comprehensive list of files whose dissemination falls under INSEE's responsibility, and a link to partner's sites (Centre Quetelet and CASD) for other research data files will be published on INSEE website.

Timeline:

2016 Q IV (action is beginning in 2015 and be completed at the end of 2016)

18. The National Institute for Statistics and Economic Studies and the National Statistical Advisory Committee should establish procedures to consult regularly and raise statistical awareness among potential users of official statistics. (European statistics Code of Practice, indicators 11.1 and 11.3)

Current situation:

INSEE conducts surveys on user satisfaction. These surveys target different user categories: the general public, journalists, researchers, academics, companies, associations, local authorities, members of parliament, and the executive are all, to different extents, users of official statistics, many of which are produced by INSEE.

The satisfaction surveys deal with particular topics in which modifications appear desirable. They generally provide results within four months. These results are compared with other previously gathered data, and then an action plan is produced. Only a few selected survey results are currently published.

User satisfaction mainly target current users and rarely potential users. To raise statistical awareness, INSEE has made four communication kits to explain to the general public how the institute designs the indicator, who uses it and for which purposes. A kit contains three tools: a pedagogic document entitled "Understand..." (eight pages with many illustrations), a short and educational video entitled "... in questions" (less than five minutes) and a quiz (ten multiple choice questions).

Improvement action 18.1: Publish the results of the satisfaction surveys

All survey results on user satisfaction will be published on INSEE website.

Timeline:

2016 Q IV (Completion of the publication of user satisfaction surveys will begin in 2015)

Improvement action 18.2: Communicate with potential users

INSEE will consult more regularly potential users of statistics and will improve its pedagogy to general public and the potential users by using social media and working with organizations, which popularize science, economics or statistics among the general public or the schools.

Timeline:

2017 Q II: a first communication plan is defined.