



Introducing a National Code of Practice for Official Statistics: Experiences from Ireland

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Abstract

For a number of years the Central Statistics Office (CSO) in Ireland, assisted by the National Statistics Board has been carefully building a national statistical system; an Irish Statistical System that comprises all compilers of official statistics in Ireland. This paper outlines, how in 2013, the CSO launched a new national code of practice for official statistics, the *Irish Statistical System Code of Practice for Official Statistics* (ISSCOP) in an attempt to further this ambition and also introduce a common understanding of quality across all data compilers of official statistics in Ireland.

Keywords: statistical system, trust, quality

1. Introduction

In 2013, the Irish Statistical System Code of Practice for Official Statistics was launched on the 21st November, 2013 at a special symposium, entitled 'Safeguarding Trust in Official Statistics' hosted by Statistical and Social Inquiry Society of Ireland at the Royal Irish Academy, Dublin. This symposium saw the publication of the official national code (CSO, 2013) and the launch of an accompanying website (www.isscop.ie).

The publication of this code was seen as an important first step towards improving the governance and consistency of official statistics in Ireland. Specifically, the code was seen as a mechanism to introduce a common understanding of quality across the diverse compilers of official statistics in Ireland and align national practices with European norms. This was seen as a necessary step to safeguarding the trust that to date had been enjoyed by official statistics in Ireland.

Importantly, the code also fulfilled national obligations specified by the Irish Government in the 2011 Public Service Reform Plan (Department of Public Expenditure and Reform, 2011). Recognising the importance of good quality information, the government tasked the CSO with developing 'a code of practice for data gathering and its use for statistical purposes across the Public Service' (Section 2.10, p.10).

This paper outlines some considerations in developing an Irish Statistical System Code of Practice (ISSCOP), the code itself and the objectives.

2. Defining 'official statistics'

One of the first challenges in introducing a code of practice for official statistics was to define what was meant by the term official statistics. From a legal perspective, official statistics are defined in



Ireland by the Statistics Act, 1993 as 'statistics compiled by the CSO or any other public authority whether under the Statistics Act, 1993 or otherwise' (Office of the Attorney General, 1993: Part 1). While this was a useful starting point, it was perhaps not the most useful definition from the perspective of practical implementation.

It was decided, for the purposes of the Irish Statistical System (ISS) that for each department or office, that official statistics would be determined by the Director General of the Central Statistics Office (CSO) in agreement with the head of the relevant public authority compiling statistics. As guiding principles, any statistics to be considered official, must be of sufficient public interest and should satisfy the following criteria:

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

It was decided that for cases in dispute, where the Director General of the CSO and CEO of the responsible public authority could not agree on whether a statistic should be classified as official or not, the National Statistics Board¹ could be asked to arbitrate. This possibility is allowed for in Section 31 (3) of the Statistics Act, 1993 and thus would not present any legal difficulties.

It was also agreed that in the interests of transparency and clarity, a list of all official statistics, assessed to be in accordance with the code of practice, would be maintained and published on the official ISSCOP website (www.isscop.ie).

3. Defining the 'Irish Statistical System'

As noted above, official statistics in Ireland are produced not only by the CSO but also by a range of other government departments, agencies and state bodies. So while the primary objective of the code of practice was to improve standards and quality of official statistics, and important secondary objective was to reinforce or make more tangible the idea of a 'statistical system', that is, something larger than the CSO and also something coordinated. Thus defining the scope or reach of the ISS for the purposes of the ISSCOP was done carefully.

The ISS was defined as those parts of the public sector involved in the collection (whether directly or indirectly), processing, compilation or dissemination of official statistics. This definition was important, as it meant that the code of practice would apply to compilers of all official statistics in Ireland and not just those compiling European statistics. Thus, the scope of the ISSCOP would be much broader than European Statistics Code of Practice (ESCOP)². Consequently, the ISSCOP must support, not only the formal coordination role of statistics across the Irish public service as defined by the Statistics Act, 1993³, but also the formal coordination role given to CSO under EC Regulation

¹ The National Statistics Board is responsible to Government for developing its statistical strategy. This responsibility includes the setting of priorities for the compilation and development of official statistics in Ireland and guiding the strategic direction of the Central Statistics Office. The Board was established on a statutory basis in November 1994, under the Statistics Act, 1993.

² The European Statistics Code of Practice was adopted by the Statistical Programme Committee on 24 February 2005 and was revised by the European Statistical System Committee in September 2011.

³ In particular, Sections 11, 30 and 31.



223/2009⁴ in relation to European Statistics. Thus, as noted earlier, the definition of official statistics, from an ISSCOP perspective, would be wider than statistics compiled for European purposes and would also include statistics compiled for national purposes.

4. Outline of the code

In developing a national code of practice for Ireland both best international standards and very practical, local, considerations were taken into account. For example, the maturity of the current system, both in terms of culture, professionalism and statistical competence had to be considered. There was little point in introducing an overly prescriptive system if it would only result in failure. This was particularly important as adherence to the code would be voluntary.

In 2013, the landscape of statistical compilers in Ireland was quite uneven. Some departments already adhered to very good practices and applied quality standards comparable to the ISSCOP and so adopting the national code would not present every department or agency with an especially onerous burden. For others however, the difficulties would be greater. For example, some government departments headed by Ministers might find the adoption of principles such as 'timeliness & punctuality' quite challenging and restrictive, as it would prevent reports being delayed for anything other than purely technical reasons. Thus, from the perspective of changing the culture and compilation practices in Ireland and introducing the concept of a statistical system, the first two principles (Professional independence and Timeliness & punctuality) are perhaps where most resistance was anticipated.

As official statistics compiled for European purposes are a subset of national official statistics, it was also important that the ISSCOP should be consistent with the ESCoP to avoid duplication and inconsistencies. Although, the ESCoP comprises of 15 principles, the ISSCOP was distilled down to 5 core principles. Reflecting on the maturity of the statistical system in 2013, these were seen as the most important from an Irish perspective. Thus some principles, such as, burden or cost effectiveness was seen as being of secondary importance in the short to medium term. In time it is envisaged that, as the ISSCOP becomes accepted it may become more comprehensive in line with the ESCOP. The ISSCOP principles are detailed in Appendix 1. In summary they are:

1. Professional Independence;
2. Timeliness & Punctuality;
3. Accessibility & Clarity;
4. Commitment to Quality; and
5. Confidentiality.

During pre-launch, preparatory, discussions with several important key institutions to help anticipate reaction and problems, a few other unanticipated complications were also dealt with. One was confidentiality, where in some cases departments publish detailed reports that involve naming institutions (for example, the Department of Education & Skills publish statistics by school). It was agreed between CSO and all government departments and agencies that the wording "public authorities ensure that statistical outputs do not lead to the direct or indirect identification of an individual person or entity" would not prohibit the publication of such statistics that are clearly in the public interest. Another unanticipated complication was the Central Bank; the bank, while subject to

⁴ Article 5.1 of Regulation (EC) No 223/2009 of the European Parliament and of the Council of 11 March 2009 on European statistics and repealing Regulation (EC, Euratom) No 1101/2008 of the European Parliament and of the Council on the transmission of data subject to statistical confidentiality to the Statistical Office of the European Communities, Council Regulation (EC) No 322/97 on Community Statistics, and Council Decision 89/382/EEC, Euratom establishing a Committee on the Statistical Programmes of the European Communities.



the Statistics Act, is also subject to other national and European legislation. Luckily the Central Bank was keen to cooperate and participate and therefore a formal Memorandum of Understanding was agreed between CSO and the Central Bank to clarify matters of jurisdiction.

5. Accreditation & Incentive

Beyond official European statistics, compilers of national statistics in Ireland cannot be forced to adhere to any quality standards or code of practice. There is nothing in the Statistics Act, 1993 that compels compilers to adhere to the ISSCOP - there is no 'big stick'. There are nevertheless incentives that can be created to encourage compilers to volunteer to adopt the ISSCOP.

In designing an ISSCOP logo⁵, it was hoped not only to build a brand or identity for the ISSCOP and the wider ISS but also to try and create a mechanism that would incentivize compilers to adhere. The ISSCOP logo was designed to resemble the StatCentral⁶ logo which as the portal to all of Ireland's official statistics is another key pillar of the ISS. The logos and colour schemes used in StatCentral and ISSCOP were selected to reinforce each other. It is anticipated that the ISSCOP logo, once awarded, will become a de facto seal of approval or quality (although ISSCOP will never formally use such a term). It was hoped that once ISSCOP logos begin appearing on statistical releases, it would create peer pressure, where those departments who have not signed-up, would start to feel excluded. It remains to be seen whether this is in fact be the case.

6. Gamekeeper and Poacher

The introduction of a national code of practice put CSO in the rather unusual and somewhat awkward position of being simultaneously both gamekeeper and poacher i.e. statistical compiler and statistical auditor. A key question was how to balance these two roles without falling off the high wire. There were mixed views. At the launch of the ISSCOP, the chair of the National Statistics Board envisaged a role for the NSB similar to the role played by the European Statistical Governance Advisory Board (ESGAB)⁷, providing an independent overview of the ISS and implementation of the ISSCOP (O'Hara, 2013). While there was logic to this, the proposal raises a number of practical problems; firstly, their mandate does not foresee such a role and thus would necessitate a review of the Statistics Act. Secondly, as currently configured, the NSB is not sufficiently resourced nor has the technical competence to undertake statistical peer reviews.

Others felt that as CSO already undergoes the more rigorous ESCOP peer review, this was sufficient and no additional steps were required. Others felt that 'what's good for the goose is good for the gander' and that in the spirit of fairness and transparency, that CSO should undergo the same ISSCOP peer review as every other member of the ISS. The CSO could be reviewed by a peer review team comprising of national and international members. Whether this approach will be adopted remains an open question.

7. Hopes and Ambitions...

The introduction of a COP for Ireland is an ambitious project. The CSO has no legal mandate to compel compilers to cooperate. Thus, for the ISSCOP to succeed, much persuasion and compromise will be necessary. This will take time and effort and will be doubly challenging as the effort is not sufficiently resourced or funded. Nevertheless, the CSO has undertaken this challenge with characteristic enthusiasm and vigor.

⁵ See Appendix 2

⁶ See <http://www.statcentral.ie/>

⁷ See <http://epp.eurostat.ec.europa.eu/portal/page/portal/esgab/introduction>



Since the launch of the ISSCOP in November 2013, work has begun designing templates to assist government departments and agencies self-assess their status prior to a formal peer review. These templates are being designed in consultation with a handful of volunteer departments and lean heavily on the ESCOP Non-NSI templates. This has been done to maintain consistency with ESCOP and also to avoid re-inventing the wheel. In 2015 it is envisaged that the first self-assessments will begin, followed in 2016 by the first wave of peer reviews. It is anticipated that the first ISSCOP accreditations may be awarded in 2017.

8. Conclusions

So far government departments and agencies have reacted positively and enthusiastically to the ISSCOP. Many departments could immediately see the benefit of accreditation; both for improving their own data management and quality of statistics but also in having the ISSCOP logo on their publications. Of course some departments have remained silent and as yet their views are unclear. It is only when the first peer reviews begin that the full picture will emerge.

It is hoped that the ISSCOP while bringing benefits in its own right, will also support the idea of a national statistical system (The ISS), which will ultimately improve the provision of statistical services to support policy formulation and evaluation in Ireland and contribute to the transparency and accountability of public policy generally.

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Appendix 1 - Principles of the Irish Statistical System Code of Practice

The Irish Statistical System Code of Practice (ISSCOP) was launched on the 21st November, 2013 at a special symposium, entitled 'Safeguarding Trust in Official Statistics' hosted by Statistical and Social Inquiry Society of Ireland at the Royal Irish Academy, Dublin. The official website (www.isscop.ie) was also launched at this event.

The ISSCOP comprises of 5 key principles. For more information, and to view the indicators associated with each principle see www.isscop.ie.

1 - Professional Independence

The production of official statistics is based on the application of independent, transparent and objective standards and free from any political or other external interference. The objective is to ensure credibility and public trust in Official Statistics.

2 - Timeliness & Punctuality

Official statistics are released in a timely and punctual manner.

3 - Accessibility & Clarity

Official statistics are presented in a clear and understandable form, released in a suitable and convenient manner, available and accessible on an impartial basis with the appropriate supporting information.

4 - Commitment to Quality

All compilers of official statistics systematically and regularly review processes to support continual improvement in process and product quality.

5 - Confidentiality

Public authorities that produce official statistics ensure that statistical outputs do not lead to the direct or indirect identification of an individual person or entity

Appendix 2 - ISSCOP Logo

