

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

The Irish Statistical System – Preserving Trust through Quality Standards

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(read before the Society, 21st November 2013)

Introduction and Context

*Statistics are above the public debate in that they must be seen to be produced impartially, free from political interference and commanding trust. Statistics are below the public debate in that they underpin decision-making, policy development and good public administration. In a nutshell, the challenge... is: get them right, get them trusted and get them used.
(Tim Holt, Thirtieth Geary Lecture 1999)¹*

Our discussions this evening, at the launch of the Code of Practice for the Irish Statistical System, is about the second of the challenges in the above quote i.e. ...*Get them trusted...* It is not enough to produce high quality official statistics – they must be clearly seen to be objective and free from political and other outside interference. Users and the general public must be assured that the legal basis and governance arrangements for the production and publication of official statistics reflect best international practice for professionalism and independence. This is the basis of credibility and trust in official statistics. It is easy to take for granted but is very difficult to retrieve if lost, or even perceived to be.

Statistics are increasingly being used in the implementation and monitoring of policy at national and international levels. In Ireland, we are well aware of the importance of high quality and timely economic indicators which must be submitted in reports to the Troika.² These indicators and prescribed timelines are specified in the memorandum of understanding that accompanies the Programme of Assistance. Moreover, since the global financial crisis, official statistics are increasingly being used to automatically trigger policy decisions or impose sanctions for breaking rules. This underlines the need for high quality and for codes of practice to ensure universal high standards.

In this paper I want to focus on four themes: firstly, the work of the NSB and how it has evolved to focus on strategic issues for the Irish Statistical System (ISS); secondly, quality standards and the issue of trust; thirdly, the European Code of Practice and the work of ESGAB; and finally, I raise some issues around the challenges of implementation of the ISS Code of Practice.

The NSB’s Role and Remit

The National Statistics Board was set up on a non-statutory basis in 1986 and put on a statutory footing under the terms of the Statistics Act 1993. The functions of the Board under the terms of the Act are to guide the strategic direction of the Central Statistics Office (CSO) by in particular:

- (a) establishing priorities for the compilation and development of official statistics;

¹ Holt, T 1999, *Official Statistics: Above and Below The Public Debate*, Thirtieth Geary Lecture.

² The Troika consists of the European Union, the European Central Bank and the International Monetary Fund.

(b) assessing resources of staff, equipment and finance which should be made available for the compilation of official statistics;

(c) arbitrating, subject to the final decision of the Taoiseach, on any conflicts which may arise between the office and other public authorities relating to the extraction of statistics from records or to the co-ordination of statistical activities.

(Statistics Act, 1993, section 19)

The composition of the board is set out in the Act and comprises seven members plus the Director General of the CSO, ex officio. It is appointed by, and reports to, the Taoiseach. The link to the Office of the Taoiseach is important as it reinforces the deliberate decision to establish the CSO, on its foundation in 1949, as an office under the aegis of the Taoiseach in order to ensure its independence.

Section 31 (3) of the Statistics Act specifies the arbitration role of the Board

The Director General or any public authority may request the National Statistics Board to arbitrate on and, when agreement cannot be reached, to make recommendations to the Taoiseach for his decision on proposals made by the Director General under subsection (1) or (2) of this section.

The proposals referred to in (1) and (2) above relate to the coordination role of the CSO in getting the cooperation of public authorities in the use of administrative records for statistical purposes, and to the obligation on them to consult with the Director General regarding their own data generation. The role of the NSB in this context can be seen as a kind of 'honest broker' between the wider public system, the CSO and the Taoiseach.

The NSB and the ISS

In its early days, the NSB interpreted its remit by focusing primarily on the development of official statistics through the work of the CSO. However, as Ireland's period of rapid economic growth from the mid-1990s onward brought the challenges of managing prosperity, the links between policy development and statistical needs came into sharp focus. The Board, in tandem with the CSO, began to turn its attention to the wider public service and to develop the concept of the Irish Statistical System. This was driven by a number of developments. Public policy during the boom period had to adjust to an unprecedented scale of growth and speed of change. Among the factors that drove a greatly increased demand for statistical information among ever more diverse user groups were the need for statistics to provide an evidence base for policy decisions; to help measure and understand change; to enable assessment of policy impact; to facilitate coordination and ensure accountability and value for money. At the same time, the growth of electronically based administrative records meant that, if such data could be mined for statistical purposes, the cost of data collection could be reduced and the burden on providers lessened.

Thus, in its 2003-2008 Strategy the NSB set out a blueprint for a coherent whole system approach that could: respond more effectively and efficiently to the increasing demand for statistics; best take advantage of the potential of existing data resources and build more effective datasets, while maintaining high quality. The term **Irish Statistical System (ISS)** was used to capture this broader idea of the resource base for official statistics. It recognised that official statistics compiled within the CSO were not necessarily all generated by the CSO through surveys and enquiries. They could also be produced, to some extent, outside the CSO and/or be extracted from administrative sources in government departments and agencies, and that this required greater coordination.

This led to a series of examinations by the CSO of the administrative data holdings of twelve government departments and the Revenue Commissioners, which produced a set of recommendations for the development of those data holdings to support evidence-informed decision-making. It also resulted in the placing of statisticians in government departments and the setting up of StatCentral as the portal to Ireland's official statistics.

The Board's current 2009-2014 strategy has extended and deepened this focus on the development of the ISS in the context of evolving policy needs and a resource-constrained environment. This has involved raising awareness of statistics and developing statistical capacity within Departments. It is fair to say that significant, but uneven, progress has been made in recent years. There have been some important advances in various parts of the administrative system. Formal relationships (Memoranda of Understanding) between the CSO and a number of key holders of administrative data have also been agreed.

Within the CSO, an Administrative Data Centre was set up in 2009, and houses a data warehouse which documents and manages the administrative data being received by the CSO. Metadata relating to each microdata file are included in the warehouse. As well as allowing more efficient access to administrative records, this development has also facilitated new statistical analyses. Some of the projects undertaken include employment turnover and school leaver analyses, and the centre is also exploring the potential to use administrative data to replace survey data.

All of this has improved the analytical capacity of the system and, in some cases eliminated duplication of certain activities through the development of joint surveys between CSO and other public sector organisations. A good example is the collaboration between the CSO and the Central Bank and Financial Services Authority of Ireland (CBFSAI) to rationalise their data collection by developing a single mechanism for data capture from financial institutions. The Bank collects and shares the data with the CSO, who then compile the statistical information required by both organisations, and return it to the Bank to meet the CBFSAI's national and international statistical requirements. These collection systems are operated under the Central Bank's legislation which guarantees confidentiality of the data collected. To allow unrestricted exchange of the data between both institutions, legal mandates were signed in advance by all the relevant data providers. This cooperation has streamlined data collection,³ reduced the statistical burden on the data providers, and strengthened the analytical capacity of both institutions. More importantly, this and other collaborative exercises have provided new analysis and outputs which are of significant importance for policy development and evaluation.

However, while the Board welcomes these developments, there remain concerns at the slow progress in the kind of institutional or structural change needed to build what is effectively a national data infrastructure (NDI). Moreover, restriction in the use of some administrative sources and the absence of formal protocols for statistical production in departments and agencies were identified as serious issues that needed to be addressed. So, in 2011, the Board published two short papers⁴ in which these issues were outlined, stressing the way in which 'joined up data' could support the achievement of government reform objectives i.e. 'joined-up policy'. In these papers the NSB re-emphasised the urgency of developing **unique identifiers** that would allow the data linkage between people, businesses, and locations, which is fundamental to building an NDI. The Board called for a strategic initiative from government to integrate the Irish Statistical System, suggesting that a national cross-government data strategy was central to meeting government reform objectives. Such a strategy would not only maximise the utility of administrative data for statistical purposes, but would also facilitate policy objectives such as more efficient service targeting and delivery, cost savings, and effective policy-monitoring. In this way the NSB has adopted a strong advocacy role in relation to the development of the ISS and a NDI.

Public Sector Reform and the ISS

There have been some significant developments in the ISS, as part of the public sector reform agenda.⁵ The NSB regards the assignment of a lead role to the Department of Public Expenditure and Reform (DPER) to promote data sharing across the public sector, as a very welcome development. Up to now, good progress has been made towards an integrated statistical infrastructure, but it has largely been of a bilateral nature between the CSO and individual departments. An integrated approach to the collection of administrative data across the public sector will create, in effect, a NDI. This will require standardisation of data collection and processing methods and, as mentioned above, the use of unique identifiers to facilitate data linking. The NSB regards the latter as one of the key strategic issues for the ISS.⁶

Two recent developments give reason to feel confident that significant progress can be made. The first is the announcement, in September, by the Minister for Public Expenditure and Reform that the Government has agreed to take actions to improve data-sharing in the public service. The proposed Data-Sharing and Governance Bill is to be directed at creating a legal framework to make data sharing easier, including improving governance and security, and facilitating electronic data exchange, storage and retrieval in interactions between citizens and the state. The Government has also decided to review the legal basis of the PPSN, including ensuring that it has a one-to-one link to the Individual Health Identifier (IHI), and to roll out the Public Services Card across the public service.

³ This initiative allowed the CSO to discontinue three surveys and the CBFSAI to cease two others.

⁴ National Statistics Board, 2011 *The Irish Statistical System: The Way Forward*.

⁵ National Statistics Board, 2011 *Joined Up Government Needs Joined Up Data*.

⁶ Department of Public Expenditure and Reform, 2012 *Public Sector Reform*.

⁶ This is discussed in detail in the Board's recent review of its strategy pp 29-30. See National Statistics Board, 2012 *Implementation of Strategy for Statistics 2009-2014 Mid-term Review*.

The announcement by the Minister for Communications in October that, by 2015, Ireland would (finally) have a national postcode system, based on unique identifiers for each address, is also very significant. Apart from the obvious benefits to consumers, this is a very welcome development from a data and statistical perspective, and one that the NSB have been recommending for a long time. It will enable geo-referencing of data to become a standard practice, and facilitate greatly improved data analysis at localised level to underpin policy and planning.

These commitments respond directly to the set of strategic priorities set out by the NSB at the end of 2012 in its Mid-term Review of the implementation of its Strategy for Statistics 2009-2014. The Board looks forward to progress on addressing the data sharing issues and the widespread use of unique identifiers. However, it is important to recognise that, in order to make a national integrated system a reality, all government departments and agencies need to recognise the inherent administrative and statistical value of linked data. Public bodies need to be committed to supporting and facilitating the changes needed, while paying due attention to privacy and data protection concerns. Moreover, while greater data sharing can deliver dividends of both statistical and administrative efficiency, the CSO retains primary responsibility for statistical standards. This underlines the relevance and importance of the new Code of Practice.

Quality Standards and Trust

This brings me to the central theme of this paper – the matter of quality standards and the relationship between trust and quality, and the need to ensure that trust in official statistics is never compromised. One of the urgent priorities set out by the NSB in its Mid-term Review is the need to professionalise the ISS by introducing standards based on agreed Codes of Practice and Protocols. The Director General will explain in more detail the immediate rationale for the introduction of a Code of Practice (CoP) for the ISS. In this section, I want look briefly at the strategic issue of trust as it relates to official statistics and refer, in particular, to the UK experience.

There is a strong link between trust in the integrity of official statistics, and public trust in our whole system of government. Statistics are very often at the base of debates about policy and practice, and generally inform public discussion in democracies. Public confidence in the information produced by the state is fundamental to ensuring transparency and accountability and therefore to the functioning of democracy itself. When decision-makers distrust the evidence base, they will tend to ignore it. More fundamentally, if the general public do not trust the statistics that underpin and provide a rationale for policy, and measure success or failure, then government and public bodies will themselves not be trusted.

The crash of the Irish economy and its aftermath has severely dented public trust in key societal institutions. We know from a recent study which measured social cohesion in 34 OECD and EU countries that Ireland was in the lowest rank with regard to trust in institutions. While we ranked in the middle tier overall (12th), and scored well on the strength of our social networks, sense of solidarity and helpfulness, our trust in institutions has plummeted from the top to the bottom tier in the past 20 years or so.⁷ The OECD's 2013 publication *Government at Glance* has shown that in the five years since the recession (between 2007 and 2012), Irish confidence in Government fell from 63% to 35% which is the highest decline in the OECD. A recent Irish survey of 1,000 30-39 year old adults, also found low levels of trust in many public institutions with just 12% saying they trusted the government and only 20% trusting the media in general.⁸

The crash also had the effect of highlighting the importance of high-quality statistical information for both national and international decision-making. Fortunately, we have no reason to believe that the Irish population lacks a high level of trust in official statistics. Indeed, we fared well in the 2010 special Eurobarometer Study of European citizens' knowledge of economic indicators, sponsored by the European Commission. While the Scandinavian countries, Luxembourg and the Netherlands ranked highest in terms of **trust** in official statistics, it is encouraging that Ireland ranked 8th out of 27 Member States with 57% of Irish respondents saying that they "tend to trust" official statistics. Just 20% "tend not to trust" them, with the remainder "don't know". What is really heartening is that Ireland had the lowest level of **distrust** of all 27 Member States (20%) – less than half of the average.

The UK Experience

In the same study, the UK had the highest distrust levels (61%) and ranked at the bottom of the table. This situation reflects a long-running lack of trust in the UK statistical system going back to, at least, the 1980s when

⁷ Bertelsmann Stiftung Foundation 2013, see www.social-cohesion.net Ireland was in the top tier of countries for trust in public institutions in the period 1989-96.

⁸ Behaviour and Attitudes Survey for Irish Independent and Today FM, Irish Independent, 11 November, 2013.

there was a widespread view that there was political interference in the production of statistics and some controversy about multiple revisions of the statistical definition of unemployment. I will discuss the UK experience in some detail here, because I believe that there are some useful lessons to be learned from it.

In 2004, reacting to what was regarded as a crisis in confidence in public trust in official statistics, the UK Statistics Commission published a report on the need for statistical legislation, arguing that public confidence in official statistics is essential for the effective working of the state and delivery of public services.⁹ As a result, and in order to restore trust and public confidence, a new legislative basis for the production of official statistics – the UK Statistics and Registration Service Act 2007 – was put in place. This included provision for the creation of the UK Statistics Authority.

The statutory objective of the Statistics Authority is to promote and safeguard the production and publication of official statistics. It achieves this by maintaining a Code of Practice for Official Statistics (the Code) to ensure quality and integrity. According to the 2007 Act, official statistics are defined as statistics that are produced by government departments and their agencies and all are expected to meet the quality standards set out in the Code, which is monitored by the Statistics Authority.

A House of Commons Select Committee Review of the 2007 Act: *Public Trust in Official Statistics*, published earlier this year, identified a number of issues regarding the operation of the Code in the UK.¹⁰ Some of these are very specific to the UK statistical system, which is highly decentralised, but a number of the more general points highlighted by the Committee are relevant to the Irish case, as they serve to identify some of the pitfalls in CoP implementation. These can be summarised as follows.

- The CoP can only be effective if it is correctly understood, applied and enforced. Ongoing assessment to ensure compliance establishes the Code as a practical standard and ensures ‘shared interpretation’.
- It is necessary to have a strategy of citizen engagement to ensure that public confidence in official statistics is maintained. This should include surveys of users to assess confidence in official statistics.
- It is important that the functions of oversight, scrutiny and assessment of official statistics be clearly separate from their production and delivery.
- The labelling of statistics as ‘National Statistics’ was found to *lack meaning*, to be *at best confusing and at worst genuinely misleading*¹¹. The Authority was found to be unable to determine which statistics will be subject to its formal process of assessment against the Code. Departments tried to circumvent the obligation to try to meet the standards in the Code by publishing datasets as ‘administrative’, ‘management’ or ‘research’ data. This can undermine the core purpose of the Code to ensure minimum standards of quality and integrity.
- While confidentiality must be maintained, the Committee found that barriers to data sharing and effective access exist, both within the public service and with external users. The Committee recommended the encouragement of a data-sharing culture within government departments, urging the Authority to take its own legal advice in cases where Departments may be acting on ‘unreasonably risk-averse legal advice’.

A further insight into the dimensions of trust is provided by the OECD Electronic Working Group on Measuring Trust in Official Statistics. This group concluded that trust in official statistics is based on three underlying factors, first put forward in 2004 by Fellegi and later adopted by the Australian Bureau of Statistics.¹² **Structural factors** include the extent to which statistics are, or are perceived as being, objective and independent; impartial (not subject to political interference); and transparent (release dates are publicised in advance; clear reasons for changes or revisions, etc). **Statistical factors** include complying with international

⁹ Legislation to Build Trust in Statistics, 2004, Statistics Commission, UK

¹⁰ See House of Commons Public Administration Select Committee, 2013 *Public Trust in Government Statistics: A Review of the operation of the Statistics and Registration service act 2007*, Ninth Report of Session 2013-2014, HC 406.

¹¹ Paragraph 61

¹² www.oecd.org/document/43/0,3746,en_2649_33715_50018923_1_1_1_1,00.html. See also Brackfield, D 2011, OECD Work on Measuring Trust in Official Statistics, Paper to ISI Congress, Dublin. Fellegi, I 2004, Maintaining the credibility of official statistics (Statistics Canada), Paper to conference of European Statisticians. Australian Bureau of Statistics (2010) *Trust in ABS and ABS Statistics: A survey of specialist users and the general community*, Australian Bureau of Statistics.

standards, sound methodological practices, robust statistical processes and quality outputs. **Reputational factors** are those which determine public attitudes to official statistics which include cultural norms and past incidents of erroneous data or unethical behaviour experiences.

Statistics offices can influence reputational factors by effective engagement with users, media and other key stakeholders; and by their preparedness to openly correct or address misleading or inaccurate media reports, or unethical practices. Protocols, codes of practice and quality management can attempt to address each of the three dimensions. However, it is a reality that reputational factors are also a matter of culture and history, and that Government, as much as statistics offices, has a major role to play in fostering an maintaining trust in official statistics, both by adhering to the highest ethical standards themselves and by promoting and supporting the independence of statistical authorities.

The credibility of statistical systems internationally is underpinned by the UN Fundamental Principles of Official Statistics which create a common international culture for ethical standards in statistics and were formally adopted in 1994. Within the European Union the European Statistics Code of Practice, which is consistent with the UN principles, provides the basis for a common quality framework in the European Statistical System (ESS). I expect that the Director General of Eurostat will deal with European matters in some detail, so I will confine myself to some comments based on my experience as a member of the European Statistical Governance Advisory Board (ESGAB).

ESGAB and the European Statistics Code of Practice

The ESS has a significant impact on the work of the CSO as the vast majority of the statistics produced are required under EU statistical legislation. The ESS is a partnership between Eurostat, the National Statistical Institutes (NSI) of member states, and other national authorities responsible for the development, production and dissemination of European statistics. The primary objective of the ESS is to guarantee that European statistics, compiled in all the Member States of the European Union, are comparable, reliable, relevant and usable. Eurostat has the central function in providing leadership, fostering cooperation and ensuring the availability of harmonised European statistics of a high quality.

Official European statistics are regulated by the 15 Principles in the European Statistics Code of Practice (ES CoP) which cover the institutional environment, the statistical production processes and the output of statistics. A set of indicators of good practice for each of the Principles provides a reference for reviewing the implementation of the Code, which was revised in 2011. ESGAB was established by the European Parliament and the Council in 2008 to provide an independent overview of the ESS with particular regard to implementing ES CoP insofar as it relates to Eurostat, and to assessing the implementation of the Code in the European Statistical System as a whole. ESGAB's aim is to enhance professional independence, integrity and accountability – key elements of the Code of Practice – in the European Statistical System, as well as the quality of European statistics. It comprises six members and a chairperson.

ESGAB prepares an annual report to the European Parliament and the Council. It can also advise Eurostat on appropriate measures to facilitate implementation of the Code; on how to communicate the Code to users and data providers; on updating the Code; and on questions related to user confidence in European statistics, if considered necessary.¹³

In its five annual reports for the years 2009-2013, ESGAB has made 44 recommendations to the Council and Parliament. The most prominent of these address professional independence, governance and coordination, with the remainder addressing issues of resources, cost effectiveness and quality, as well as equal access, communication, training, methodology, and dialogue with users. As regards professional independence, the politicisation of statistics is a considerable problem in some member states and the independence of NSIs is compromised as a result. ESGAB has urged governments to commit publicly to the professional independence of NSIs and to ensure that decisions on statistical methodology and production processes are made by professional statisticians only.

ESGAB's recommendations on ESS governance have addressed the role of the Committee on Monetary, Financial and Balance of Payments (CMFB) and relations with the European System of Central Banks. It has also encouraged the creation of ESGAB-like bodies at national level to oversee compliance with the Code. The steady reduction of resources for the production, dissemination and development of European statistics in the face of rising demand has been an ongoing concern, as this has the potential to jeopardise quality. In this

¹³ See www.ec.europa.eu/esgab

context, ESGAB has supported reform of the production system of European statistics to achieve greater integration and efficiencies, as well as advocating exploration of the legal changes necessary to increase the use of multiple data sources, administrative data, and the exchange of micro-data, while not compromising on quality and data protection. In its 2013, report ESGAB reiterates the importance of unique identifiers to maximise the use of administrative data and to pave the way for data matching and linking, so as to facilitate connections between various databases and registries.

ESGAB is largely satisfied with the quality management and assurance systems in NSIs. More recently its interest has shifted how ‘other national authorities’ (ONA) that contribute to the development, production and dissemination of European statistics comply with the ES CoP. This has been a particular focus of the 2013 report which has been submitted to the Council and Parliament and was published this week. The coordination role of the NSI is seen as central to ensuring the production of high quality European statistics and adherence to the ES CoP.

To this end, ESGAB recommends that NSIs take responsibility for ensuring the satisfactory quality of European statistics produced by ONAs and have a clear role in addressing quality and methodology matters with owners of administrative data. This is important in light of the launch of the Irish Code of Practice, as it directs attention to the link between coordination and quality. In Ireland there are 15 such agencies and departments producing European statistics and they are a vital part of the ISS. Since these providers, as producers of European statistics, are already adhering to the ES CoP in respect of European statistics, they are a natural starting point for the implementation of the Irish Code of Practice. Ideally they should be the early adopters and leaders in implementation and compliance.

In its 2013 report, ESGAB also recommends enhanced relations between NSIs and parliaments including greater transparency about the resources available for developing, producing and disseminating the statistical information required for policy-making. In ESGAB’s view, regular reporting to national parliaments on the statistical activities of NSI’s and compliance with ES CoP would enhance democratic accountability and strengthen relationships with parliaments.

Compliance with the ES CoP is monitored by means of peer reviews of ESS members. A new round of these reviews will commence in 2014 and will include other national authorities producing European statistics.

Challenges of Implementation and Compliance Politicisation

A key dimension of trust in official statistics is politicisation. The global economic crisis has highlighted the importance of high-quality statistical information for both national and international decision-making. But it has also shown the problems that can arise when statistics and those who produce them are manipulated for political purposes – the case of Greece being an example. Thus, the principle of professional independence is critical to the credibility and integrity of official statistics. Independence can never be taken for granted, even if underpinned by legislation. It is the first principle in the European and in the Irish Code of Practice.

Fortunately, there has never been a significant difficulty in this respect in the Irish statistical system to date, but extending the Code may present challenges for other national authorities who are unaccustomed to the norms of the UN Fundamental Principles or the ES CoP, and are closer to the political system. Across the ESS, a frequent issue in this context is access to statistical data prior to publication (pre-release access), and the need for a clear distinction between, and separate publication of, statistical releases and political/policy statements. Perception is extremely important here and hence ‘minor’ lapses such as leaking favourable data as part of a political ‘spin’ operation must be guarded against. In developing the profile of the ISS it is important to be alive to the danger of the ‘weakest link’ damaging the reputation of the ISS as a whole.

Designation of Official Statistics

We have seen from the UK example that there can be difficulty in practice in the labelling of statistics as ‘official statistics’ leading to confusion and devaluation of the designation. This suggests that there is need for caution and deliberation in this process, so that the designation of ‘official statistic’ or ‘ISS CoP compliant’ will have real prestige value for the compilers and be recognised by users as a quality mark. This will minimise the tendency to try to circumvent the Code, which emerged in the UK system. Leadership from the statistical unit within public authorities and liaison arrangements with, and support from, the CSO will be key factors in determining success. Also, it is important to recognise that labelling is not a once off ‘award’ and that quality compliance requires ongoing vigilance.

Monitoring Compliance

It is self-evident that the functions of oversight and scrutiny of official statistics should be separate from production, and that there should be independent compliance monitoring of the ISS CoP. The ES CoP peer reviews will monitor the production of European statistics, but as the ISS CoP is more widely applied there will be a need to put in place a structure for monitoring compliance. Given the remit of the NSB and its role to date in promoting the ISS, acting as a 'sounding board' for the CSO, and developing successive national strategies for statistics, it would seem appropriate that it would have a role in overseeing compliance with the code. Any substantial role would require legislative change to widen its functions and its composition. However, even under its current remit, it would seem possible for the Board to have some consultative role.

Legislative Review

The development of the ISS in recent years has highlighted the need for a review of the legislative framework covering the collection and usage of official statistical information. There is uncertainty about the various legal instruments that dictate the collection, dissemination and sharing of official data across government departments and agencies. It is recognised that the Statistics Act 1993 needs to be evaluated in the context of the current and potential diverse range of producers of official statistics.

There are also developments at a European level which may extend the responsibilities of NSIs further, through amendments to existing statistical legislation, namely Regulation 223/2009 (the EU "Statistical Law"). The proposed amendments to Regulation 223/2009 reflect the perceived need for increased scrutiny at European level of the governance of official statistics, particularly the coordination role of NSIs. Similarly in the context of the Excessive Deficit Procedure (EDP) reporting, Eurostat has been empowered if necessary to examine the source administrative data held by Public Authorities that are used by NSIs and Ministries of Finance for the compilation of macroeconomic statistics.

The Public Sector Reform Plan provides for a review of the legal framework for official statistics to assess whether it is fit for purpose in the increasingly complex environment of the ESS and ISS. This is currently being carried out by the CSO and should include, among other things, consideration of a legal definition of the ISS, a possible widening of the remit and composition of the NSB to facilitate a monitoring role, and a clear designation of responsibilities between CSO, NSB and other producers.

Finally, and returning to where I started – the issue of trust – experience in the UK and in other NSI's across Europe has shown the importance of engagement with users and the general public to promote trust and confidence in the integrity of official statistics. Such engagement should include regular surveys to assess confidence and promote quality across the ISS. Any system is only as strong as its weakest link.

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