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Peer review on the implementation of the European Statistics Code of Practice

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1. EXECUTIVE SUMMARY

Main findings (including an assessment of the co-ordination role of the National Statistical Institute):

Statec, the National Statistical Institute of Luxembourg, has reached a high level of professionalism. The acronym "Statec" stands for Central Service for Statistics and Economic Studies, which was formed in 1962.

Access to statistical results is made easy, statistical data are considered as a public good. Its reputation among main users and in the public in general is very good. There seem to be high levels of trust in the results of the official statistics in Luxembourg, which is a remarkable achievement in view of the fact that Statec has to meet the same European statistical obligations and standards as the statistical offices of bigger countries, but with much less human resources.

However, a better endowment with resources could lead to a higher quality commitment of Statec. The standards, methods, programs and procedures already used need to be made better visible.

In addition to the lack of adequate resources, Statec faces the problem that its activities are based on a Law on Statistics dating back to 1971 (or even 1962), with some minor amendments made afterwards¹. The peer review process revealed a certain discrepancy between the de facto situation and what is laid down in the legislation. The independence of the statistical authority from political interference in producing and disseminating official statistics is not specified in the Law. Other key terms such as objectivity and impartiality are also not even mentioned in the present Law. Despite these deficits Statec can be considered to be quite independent and acting in an objective way and has in so far achieved a considerable degree of compliance with the European Statistics Code of Practice (CoP).

As far as access to administrative data is concerned the situation is quite different. Access is granted by the Law, in practice, however, Statec has problems to make full use of all administrative sources, also because of conflicting legal regulations. A similar situation is given with respect to the co-ordinating role of Statec. The Law is quite clear in this regard; in practice Statec finds it quite difficult to fulfil this important role.

To get a new legislation drafted, discussed and passed in which the fundamental principles laid down in the CoP are clearly spelled out should be a very high priority. The new legislation should guarantee better access to administrative data and create a new efficient system of advisory and control bodies. Strengthening the co-ordinating role of Statec is of special relevance.

Statec is not the only producer of European Statistics in Luxembourg. Emphasis of Statec is laid on economic statistics and on national accounts. This focus can easily be understood by the institutional environment in which Statec operates. Statec stands under the authority of the

¹ All quotations from the Law on Statistics (Loi du 14 juillet 1971 portant réorganisation du Service central de la statistique et des études Économiques) are based on the English translation of the Law (Coordinated text, 25 October 1995) made available by Statec.

Ministry of Economy and Foreign Trade and is organised as an agency within the Ministry with certain autonomy as far as work program and budget are concerned. Statec is not only responsible for the collection, processing and dissemination of statistical data but also for economic analyses and forecasting. The latter activities are seen as very important for the status of Statec.

The integration of Statec into the Ministry of Economy and Foreign Trade could potentially impact on the full professional independence and impartiality as advocated by the Code of Practice. The feedback from the research activities to the production chain can have very positive effects on the quality of statistical results. On the other hand all statistical activities will need to be carefully shielded from other tasks of the Ministry in order not to risk any conflicts with the principle of impartiality, giving a potential advantage to the researchers in Statec compared to "outsiders".

The research activities also call for a special dissemination policy. The distinction between statistical results and the outcome of analyses and forecasts has to be made very clear in order to avoid confusion among users. The danger of spillovers of critique raised on forecasting results to statistical data should be seen and taken seriously.

The fact that the Director General of Statec holds additional positions in the Ministry of Economy and Foreign Trade also could raise criticism. Even if there is no real conflict of interests the general public perception may take this as an indicator of a lack of independence and impartiality.

Despite all the efforts taken by Statec in the last weeks before the peer review, the peer review process suffered to some extent from the fact that a number of documents were not available in English. The new Statec homepage www.statec.lu which was put on-line in 2006 was available in a French version only. The same is true for the very nice Statistics Portal www.statistiques.lu. An English version of the Statec homepage was launched a few days after the visit of the peer review team.

2. Introduction

With the adoption of the European Statistics Code of Practice, the Statistical Programme Committee (SPC) committed itself to adhering to its principles. At its meeting on 25 May 2005, the SPC endorsed a stepwise monitoring procedure for the implementation of the Code over three years during which countries' self-assessments should be combined with elements of peer review, benchmarking and monitoring on the basis of the explanatory indicators added to each principle of the Code.

During December 2005 / January 2006 the National Statistical Institutes and Eurostat have completed their self-assessments, the results have been summarised by Eurostat in a report submitted to the Economic and Financial Committee in May 2006 which has been published on the Eurostat website.

As a next step towards implementation of the Code, the European Statistical System is organising peer reviews to complement the self-assessments starting with 2006. They are

considered a vital element for the implementation of the Code of Practice given their capacity to encourage the sharing of best practice and to contribute to transparency in what is, essentially, a self-regulatory approach. This approach is designed to enhance accountability and to help building trust in the integrity of the European Statistical System, its processes and outputs.

The Code of Practice peer reviews follow a common methodology focusing on the institutional environment and dissemination part of the Code comprising the following principles: (1) Professional independence, (2) Mandate for data collection, (3) Adequacy of resources, (4) Quality commitment, (5) Statistical confidentiality, (6) Impartiality and Objectivity and (15) Accessibility and Clarity. In principle, the peer review is limited to the National Statistical Institute and its co-ordination role within a dispersed national statistical system. A short document provided by the National Statistical Institute which summarises key aspects of the functioning of the national statistical system is published together with this report.

During a three days visit on-site and on the basis of information material provided by the National Statistical Institute and Eurostat prior to the review, peer reviews yield a report assessing compliance with the Code of Practice at indicator level and by principle following a four point assessment scale. The report includes a refined set of improvement actions covering all principles of the Code which are being used to feed the monitoring process of the implementation of the Code in the European Statistical System.

While the peer reviewers will undertake to base their assessment to the extent possible on factual information, it is worth noting some of the limitations of the peer review process. For example, peer reviewers are dependent upon the resources made available to them (though experienced reviewers can be expected to identify where appropriate information is not forthcoming). In addition these reviews are conducted on a strategic, organisation-wide and system wide basis. Accordingly it is not straightforward to ascertain that certain practices or behaviours or systems operate in all statistical domains.

3. FINDINGS PER PRINCIPLE

Principle 1: Professional Independence

The professional independence of statistical authorities from other policy, regulatory or administrative departments and bodies, as well as from private sector operators, ensures the credibility of European Statistics.

Overall assessment:

Despite the lack of a legal basis which clearly specifies the independence of the NSI from political interference, there is a high degree of de facto professional independence.

In its mission statement "Knowledge in action" Statec stresses that it operates financially and scientifically independent and in accordance with European statistical legislation (http://www.statec.public.lu/en/statec/missions/index.html). In this respect it refers to the principle of scientific independence as stated in the Treaty of Amsterdam (Article 285), which stipulates that "the production of statistics must be impartial, reliable, objective, scientifically independent and cost-effective and that statistical information must be kept confidential."

All the interviews carried out during the peer review process underlined that Statec is de facto quite independent. Several stakeholders mentioned that Statec figures are not always popular with government. These findings are consistent with the results of the Users' Satisfaction Survey². Statistical impartiality seems not to be questioned by many users. On the other hand nearly 40% of the respondents did not express themselves on this question. Because impartiality is closely related to independence this relatively high rate of non-response might be taken as an indicator that both impartiality and independence are not seen as one of the main characteristics of the work of Statec.

Improving the independence and thus the credibility of statistical results provided by Statec should therefore have a high priority. In this context the pros and cons of the institutional environment in which Statec operates and of the additional obligations of the Director General should be reconsidered carefully.

Statec stands under the authority of the Ministry of Economy and Foreign Trade, but there is an organisational separation of employees working for Statec and other staff members of the Ministry. The members of the management and many staff members have the status of civil servants. This status is considered to be an asset which helps management and staff to resist any attempts of political pressure.

Indicator 1.1: The independence of the statistical authority from political and other external interference in producing and disseminating official statistics is specified in law.

Assessment: Partly met

Comments:

If indicator 1.1 is taken literally this criterion is not met . The present Law on Statistics includes no provision on the independence of Statec. The management of Statec is fully aware of this not very favourable situation. In the document on the institutional set up of official statistical service in Member States, Statec admits that professional independence is <u>not</u> explicitly guaranteed by law and has to refer to Article 285 of the Amsterdam Treaty.

According to Article 7 of the Law on Statistics the Minister of Economy and Foreign Trade has to take all steps necessary on behalf of the Central office for statistics and economic studies to ensure the execution of its duties, by means of an announcement, memo, or general or special instruction. From this provision it might be concluded that the Minister may interfere directly in the operation of Statec.

In contrast to this legal situation, all the evidence gathered during the peer review process underlined that de facto a high degree of professional independence of Statec is given. Nevertheless all efforts should be taken to bring the legislation in line with the Principles of the Code of Practice. The text of a draft of the new legislation has so far not been approved by the government. As a consequence no draft was made available to the peer review team.

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² The results of this Survey were published in March 2008: http://www.statec.public.lu/fr/statec/rapports/PDF_enquete_satisfaction.pdf

Indicator 1.2: The head of the statistical authority has sufficiently high hierarchical standing to ensure senior level access to policy authorities and administrative public bodies. He/She should be of the highest professional calibre.

Assessment: Fully met

Comments:

The Director General of Statec has a high hierarchical standing. He is also head of the "DG des études économiques" in the Ministry and is responsible for the Unit "Observatoire de la compétitivité". In this capacity he is a user of the results provided by Statec and not in the situation of a competitor. His position as a Vice President of the Social Council clearly shows that he is fully integrated in the network of senior advisers and policy makers in Luxembourg.

Appointment and dismissal procedures of the Director General are the same as for all the officials of the administration. Because of a change in the respective legislation the next Director General will be appointed for a fixed term of seven years.

Statec is generally consulted when new measures or legislation in the domain of statistics are planned.

Indicator 1.3: The head of the statistical authority and, where appropriate, the heads of its statistical bodies have responsibility for ensuring that European Statistics are produced and disseminated in an independent manner.

Assessment: Largely met

Comments:

The present legislation does not mention any responsibility of Statec for producing European Statistics. In its Article 1, point 7 the Law on Statistics only states that the mission of the office includes to "sustain scientific and technical relations with similar foreign and international services".

De facto the Director General of Statec and his management seem to have the sole responsibility as far as the statistics are concerned which are produced by Statec. A few other examples of European Statistics are produced by other Ministries. The responsibility of Statec in these fields is not so clear and seems to be limited. The new legislation should also contain provisions to ensure a better co-ordination in this respect.

Indicator 1.4: The head of the statistical authority and, where appropriate, the heads of its statistical bodies have the sole responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releases.

Assessment: Partly met

Comments:

Again the sole responsibility of the statistical authority as far as methods and timing of releases are concerned is not laid down in the present Law on Statistics but de facto the Director General decides upon the appropriate statistical methods, standards, procedures as well as on

the timing of releases within the framework given by European Regulations, handbooks etc. in an autonomous way. For a few statistical results of high political relevance such as the consumer price index the results are regularly discussed in special committees before releasing them (see also Indicator 6.6).

Indicator 1.5: The statistical work programmes are published and periodic reports describe progress made.

Assessment: Largely met

Comments:

The work programme for the present year is available on the homepage, but there are no periodic reports describing the progress made. Annual reports describing the activities of Statec in the past can also be found on the homepage (http://www.statec.public.lu/en/statec/reports/index).

Indicator 1.6: Statistical releases are clearly distinguished and issued separately from political/policy statements.

Assessment: Largely met

Comments:

According to all the evidence found statistical releases are never mixed up with political statements.

The distinction between statistical results and results of European Statistics in particular on the one hand and the results of analyses and forecasts on the other hand is not always as unambiguous. Statec is both a statistical agency and a research institute.

Material presented during press conferences such as "l'économie luxembourgeoise en 2006 et évolution conjoncturelle récente" is extremely well made from a professional perspective. But the material is more of the character of an exercise which in most other countries would be published by a Ministry, the National Bank or an Institute for Economic Research but not by the Statistical Institute. In press releases such as Statnews n° 55/2007 "Note de Conjoncture n° 2-2007" some of the figures are clearly marked as forecasts made by Statec.

Professional users will have no major difficulties in distinguishing between statistical results (and their various vintages) and model calculations and will read all the respective footnotes carefully. The situation might not be so clear for occasional users and the public in general. Criticism against forecasts produced by Statec might harm the credibility of the results of European Statistics provided by Statec.

In the present institutional environment it might be recommendable to distinguish statistical releases more clearly from analyses and forecasts. To have separate press releases and separate homepages could help to avoid mixing up different categories of information.

Indicator 1.7: The statistical authority, when appropriate, comments publicly on statistical issues, including criticisms and misuses of official statistics.

Assessment: Fully met

Comments:

If necessary, Statec officials react in important cases of misuse or misinterpretation of statistical results. There are some informal rules how to proceed in such a case, available on the intranet. The final decision is taken by the Director General.

A paragraph on the policy in the case of misuse of statistical results could be included into the mission statement available on the homepage to make this policy more visible.

Principle 2: Mandate for Data Collection

Statistical authorities must have a clear legal mandate to collect information for European statistical purposes. Administrations, enterprises and households, and the public at large may be compelled by law to allow access to or deliver data for European statistical purposes at the request of statistical authorities.

Overall assessment:

Statec has a clear mandate to collect information from enterprises and households. The new legislation should aim at improving the access to administrative data.

Indicator 2.1: The mandate to collect information for the production and dissemination of official statistics is specified in law.

Assessment: Fully met

Comments:

Article 7 of the Law on Statistics states that all public services, utilities, individuals and companies are bound to provide statistical information as the Central office may require. Anyone refusing to provide information, refusing to provide such information within the deadline set or providing false information can be fined.

Article 1 of the Law on Statistics is quite explicit in the mandate to collect information and to carry out studies. On the other hand the Law on Statistics has no provision stating in a similar unambiguous way that statistical results have to be published.

Indicator 2.2: The statistical authority is allowed by national legislation to use administrative records for statistical purposes.

Assessment: Partly met

Comments:

According to Article 7 of the Law on Statistics all public services are bound to provide statistical information as the Central office may require.

As this provision does not mention administrative records explicitly and also because it conflicts with other legal provisions, at present, access to administrative data is restricted. Statec is not allowed to use data of administrative registers if they are not anonymized. This situation makes it impossible to link information from administrative registers and survey data on the unit level. Despite these limitations a number of administrative registers are used for statistical purposes by Statec.

In the short term better access to administrative data free of charge could be based on special agreements. The new legislation should allow full access to administrative data for statistical purposes. Full access to administrative data and to fiscal data in particular is indispensable with a view to the severe lack of resources Statec faces.

Indicator 2.3: On the basis of a legal act, the statistical authority may compel response to statistical surveys.

Assessment: Fully met

Comments:

As mentioned above according to the Law on Statistics anyone refusing to provide information or refusing to provide such information in time, or giving incorrect information can be fined. In practice only little use has to be made of this provision (about 20 cases per year). After reminders most respondents can be convinced to report in personal contacts.

Principle 3: Adequacy of Resources

The resources available to statistical authorities must be sufficient to meet European Statistics requirements.

Overall assessment:

The resources available do not allow meeting all the European standards. Statec faces the problems typical for a small country: It has to fulfil the same European statistical obligations as the statistical offices of bigger countries, but with much less human resources.

Deficits in the compliance with the Code of Practice are to high degree caused by this lack of resources and by the shortage of staff in particular.

Indicator 3.1: Staff, financial, and computing resources, adequate both in magnitude and in quality, are available to meet current European Statistics needs.

Assessment: Partly met

Comments:

The key problem of Statec is the inadequate number of staff, whereas the quality of the staff is generally considered as adequate.

At the end of 2007 Statec had only 152 employees, more than 50% of them civil servants. The share of women is slightly under 50%, the age structure is quite favourable. Because of the numerus clausus for civil servants it is extremely difficult for the management to get the approval for hiring additional civil servants. The salaries of the employees are fully comparable to the others in the public sector, there is no "brain drain" and the fluctuation is moderate.

When comparing the number of staff with the one of other NSIs it should be kept in mind that Statec also carries out some economic modelling and forecasting exercises, activities which require highly qualified specialists and which – in general – are not included in the work program of most other NSIs.

The bottleneck of human resources is one of the main reasons why Statec outsources some of the labour intensive surveys, like EU-SILC and CIS. The limited human resources also proved to be the limiting factor for intensifying the quality management, providing more metadata and better documentation and for spelling out guidelines and the like.

The mission statement "Knowledge in action" stresses that "the specific requirements of a statistical office need intensive and ongoing training. An internal examinations committee and a training officer handle internal training programmes and relations with the National Institute of Public Administration (INAP)". Statec has a good training programme for the staff, including a programme for newcomers (on IT, on presenting statistical results as well as on statistical issues). Specialists are sent abroad for intensified "training on the job". What is still needed are additional courses on quality issues.

From the self assessment and from all the interviews it can be concluded that the endowment with IT resources is satisfactory.

Indicator 3.2: The scope, detail and cost of European Statistics are commensurate with needs. For European level reply

Indicator 3.3: Procedures exist to assess and justify demands for new European Statistics against their cost.

For European level reply

Indicator 3.4: Procedures exist to assess the continuing need for all European Statistics, to see if any can be discontinued or curtailed to free up resources.

For European level reply

Principle 4: Quality commitment

All ESS members commit themselves to work and co-operate according to the principles fixed in the Quality Declaration of the European Statistical System.

Overall assessment:

Quality work is considered as a priority task by Statec and a number of initiatives show a clear commitment of the top management towards improvement of the quality of products and processes in the future. Statec has charged two staff members with the quality project (quality delegates) who were trained on quality management issues internally (in the country) as well as attended courses in Sweden. The two persons fulfil this task only part-time (about 15%) beside their daily statistical work. Therefore, it should be noted that quality work evolves only gradually and slowly towards a systematic task in the office.

The Common Assessment Framework (CAF) project run by the "Ministère de la Fonction Publique et de la Réforme Administrative" has been taken as a framework for quality work to be introduced by Statec as well as other public administrations. Currently, Statec is a volunteer and participates in the pilot project performed by the Ministry. Objective of the CAF is to search for continuous improvement with the view to increasing users' satisfaction (quality of services – efficiency of resources); to promote culture of facts and evidence-based assessment and a culture of measurement by results; to ensure necessary coherence and sustainability in the drive for continuous improvement. In addition, there are few more projects initiated at Statec which, for sure, will contribute to the overall improvement of the organisation performance quality, e.g. a project called "Let's Work Together" which is intended to optimise the culture of communication and dialogue among Statec's various stakeholders and to promote cooperation among all members of staff.

Quality reports are produced and sent to Eurostat. They should be disseminated to external users more widely. Currently, they are provided for users upon request only.

In general, it should be also noted that there is a positive perception of users and the research community concerning the quality of the products of Statec.

Indicator 4.1 Product quality is regularly monitored according to the ESS quality components.

Assessment: Largely met

Comments:

Statisticians are aware of the quality components. More than half of the statistical outputs are monitored according to the ESS quality components. The results of the monitoring are available internally. Quality reports are on hand for statistics for which they are required by the EU legislation. To meet European standards is a high priority.

It should be noted that during the interviews users expressed their positive perception concerning the quality of the Statec products. According to the Users' Satisfaction Survey, two-thirds of the respondents have a favourable opinion on accuracy. Users are generally satisfied with the timeliness and punctuality of official statistics.

Dissemination of quality reports or communicating short summary information to the users on the main statistical products could be an immediate improvement action.

Indicator 4.2 Processes are in place to monitor the quality of the collection, processing and dissemination of statistics.

Assessment: Partly met

Comments:

Processes are in place and they are known to statisticians. During the interviews the compilation of National Accounts, Structural Business Statistics, Balance of Payment and unemployment statistics were mentioned as examples where the processes are reviewed and the quality is checked and monitored. However, it should be noted that in most of the cases the processes are not documented. Up to now, documenting detailed instructions and rules for the processes has not been considered as priority due to the lack of resources. Within the quality management project Statec plans to promote the documentation of the processes and the monitoring of them in a systematic way. The major weakness for the implementation of a systematic approach is the lack of human resources.

Indicator 4.3 Processes are in place to deal with quality considerations, including trade-offs within quality, and to guide planning for existing and emerging surveys.

Assessment: Largely met

Comments:

Statec has certain procedures how to deal with quality issues. In case of quality considerations, after discussions decisions are taken by the management board. Statistical surveys are planned in advance dependent on the financial resources. If the surveys are regulated by the EU legislation, it is much easier to gain financial resources via negotiations with the Ministry of Finance and Budgeting.

The major shortcoming is the lack of documentation of the procedures applied.

Indicator 4.4 Quality guidelines are documented and staff are well trained. These guidelines are spelled out in writing and made known to the public.

Assessment: Partly met

Comments:

Even if there are procedures in place, due to resource constraints quality guidelines or instructions are not well documented, spelled out in writing, and made public. In some cases the work started already, however. It should be done in a more systematic way.

Statec established a programme to "break the ice" aiming at promoting quality issues to the staff and to raise the awareness on the quality activities within the office. As part of this programme, the Quality delegates organised, among others, several internal and external presentations of the European Statistics Code of Practice.

Indicator 4.5 There is a regular and thorough review of the key statistical outputs using external experts where appropriate.

Assessment: Partly met

Comments:

Reviews are regularly carried out for those products for which such reviews are mandatory according to regulations (e.g. EDP). Otherwise, Statec has no plans to introduce regular and thorough reviews by external experts. On the one hand it is difficult to find experts in the country. On the other hand, such reviews are considered to be too expensive.

Principle 5: Statistical confidentiality

The privacy of data providers (households, enterprises, administrations and other respondents), the confidentiality of the information they provide and its use only for statistical purposes must be absolutely guaranteed.

Overall assessment:

Statistical confidentiality is clearly referred to in the Law on Statistics currently in force. Penalties foreseen by the Law have not been applied. The necessary physical and technological provisions are in place. Technical protocols to access data are also in force. Staff is aware of statistical confidentiality requirements.

There is a need to make guidelines on the protection of statistical confidentiality in the production and dissemination processes better visible.

Indicator 5.1 Statistical confidentiality is guaranteed in law.

Assessment: Fully met

Comments:

Article 7 of the Law on Statistics states that "Any information so provided may be used solely for statistical purposes, excluding any fiscal purposes. Individual information may on no account be disclosed. Employees and agents responsible for gathering information or participating in statistical work are held personally responsible for strict compliance with this provision. Any failure to do so will result in the application of Article 458 of the Penal Code, without prejudice to any disciplinary proceedings". Provisions of this Article will be maintained in the future Law under preparation.

It should also be noted that the Law of 2 August 2002 set up a "National Commission for Data protection" to which the Statec "must notify the existing and newly created databases".

Indicator 5.2 Statistical authority staff sign legal confidentiality commitments on appointment.

Assessment: Fully met

Comments:

Statec provided the standard declaration form on confidentiality ("secret statistique") to be signed by each staff member. Meetings with junior staff confirmed the awareness of this "Déclaration" and the requirements it includes.

Indicator 5.3 Substantial penalties are prescribed for any wilful breaches of statistical confidentiality.

Assessment: Fully met

Comments:

With reference to Article 7 of the Law on Statistics (see the end of this Article quoted under Indicator 5.1), it is clear that this indicator is met. Information provided during the meetings also showed that staff is fully aware of the possible penalties which, according to the Article 458 of the Penal Code, range from imprisonment for 8 days to 6 months and a fine from 500 to 5.000 EUR. It was stated that there were no reported cases of breaches of statistical confidentiality.

Indicator 5.4 Instructions and guidelines are provided on the protection of statistical confidentiality in the production and dissemination processes. These guidelines are spelled out in writing and made known to the public.

Assessment: Partly met

Comments:

The Self Assessment Questionnaire (SAQ) of Statec states that instructions and guidelines exist for both production and dissemination processes. Draft versions of the documentation were provided to the peer review team. Internal training on this issue was organised in November 2007. There was no evidence of regular training.

With regard to information made available to the public, it should be noted that Article 7 of the Law on statistics quoted above under Indicator 5.1 is available on the Statec website (item "Le secret statistique"). However, it can not be considered as a guideline on the protection of statistical confidentiality in the production and dissemination processes.

Indicator 5.5 Physical and technological provisions are in place to protect the security and integrity of statistical databases

Assessment: Fully met

Comments:

There is a specific Unit "Information Technology" within the Division "General Services" dealing especially with physical and technological protection provisions. There is also a high

awareness of people met during the peer review of these security and integrity questions. The use of passwords to access the statistical databases was convincingly explained.

A comprehensive document "Demande d'accès au réseau du Statec pour un intervenant externe" was also provided.

Indicator 5.6 Strict protocols apply to external users accessing statistical microdata for research purposes.

Assessment: Fully met

Comments:

Access to statistical microdata is governed by strict rules and users have to sign a specific declaration ("Règles de bon usage des ressources informatiques pour un intervenant au Statec").

Principle 6: Impartiality and objectivity.

Statistical authorities must produce and disseminate European Statistics respecting scientific independence and in an objective, professional and transparent manner in which all users are treated equitably.

Overall assessment:

It should be noted that the principle of impartiality and objectivity is not included in the current Law on Statistics. It is planed to be introduced it in the revised law which is under preparation.

There was no evidence that statistics are not compiled on an objective basis determined by statistical considerations nor that the choices of sources and statistical techniques are not informed by statistical considerations only. On the other hand there is little information or documentation on methodological issues and production processes.

The monthly meeting of the "Comité de conjoncture" of high level representatives of different Ministries before the "Flash conjuncture" (monthly publication on the state of the economy of Luxembourg) is published, is a well established tradition. Another specificity of Statec is the mission of providing forecasts (in the "Note de conjoncture") in addition to statistical data.

Indicator 6.1: Statistics are compiled on an objective basis determined by statistical considerations.

Assessment: Fully met

Comments:

The principles of impartiality and objectivity are not explicitly mentioned in the Law on Statistics. On the homepage (http://www.statec.public.lu/en/statec/objectives/index.html) there is a clear self-commitment of Statec to provide objective statistical information only. In the same statement "independence and scientific rigour" are mentioned as central for Statec's work.

In the meetings held none of the external stakeholders did question the objectivity of the work of Statec. There were no hints that the production process was influenced by other than statistical considerations.

Indicator 6.2: Choices of sources and statistical techniques are informed by statistical considerations.

Assessment: Fully met

Comments:

The management of Statec stressed the fact that for most of the products the choice of sources and statistical techniques is to a large extent determined by European legislation and guided by methodological handbooks. All users interviewed expressed their confidence in the objectivity of Statec's decisions in this respect.

Indicator 6.3: Errors discovered in published statistics are corrected at the earliest possible date and publicised.

Assessment: Partly met

Comments:

There is no systematic monitoring of errors discovered after publication and no explicit policy how to proceed when errors are detected. When errors are discovered, revised figures are usually introduced in the next publication. This was however not perceived as a sensitive issue by both Statec and the external stakeholders.

Indicator 6.4: Information on the methods and procedures used by the statistical authority are publicly available.

Assessment: Partly met

Comments:

Detailed information on methods and processes is available internally and accessible to the staff via Intranet. Some methodological information is available externally and accessible to the public via Internet. The share of tables for which metadata is publicly available is quite low (see also Indicator 15.6). In the cases in which information on methods are published (one example is employment) the descriptions given are not very detailed.

Statec acknowledged that the situation has to be improved. Due to resource constraints, priority so far was given to the availability of figures.

Indicator 6.5: Statistical release dates and times are pre -announced.

Assessment: Largely met

Comments:

A calendar of statistical releases is available at the Statistical Portal (http://www.statistiques.public.lu/fr/functions/calendrier). It provides the release dates (not the time) for the four coming months according to the SDSS standards. In addition information is given whether the publication will be accompanied by a press release or not. It seems that this calendar is not exhaustive and does not cover all the material published by Statec.

In the interviews it was mentioned that because of insufficient resources this calendar may not always be respected. It should be noted as well that 2/3 of people who answered to the Users' Satisfaction Survey were not aware of the availability of this calendar.

Indicator 6.6: All users have equal access to statistical releases at the same time and any privileged pre-release access to any outside user is limited, controlled and publicised. In the event that leaks occur, pre-release arrangements should be revised so as to ensure impartiality.

Assessment: Largely met

Comments:

Discussion focussed on two major releases from Statec:

- "Note de conjoncture" made available 3 times a year and which includes forecasts made by Statec. There is no privileged pre-release of this note.
- "Flash conjoncture" (which is a monthly release) the results of which are presented to a meeting of the "Comité de conjoncture" before being released. "Comité de conjoncture" is composed of high level representatives of different Ministries. This meeting prior to the release allows a constructive consensus among the social and economic partners by sharing information. It was said that this is a well known practice which has no impact on the impartiality and objectivity of Statec.

This policy and other cases of pre-release need to be made transparent to the public in order to achieve compliance with the CoP. Formal embargo rules also need to be worked out.

Indicator 6.7: Statistical releases and statements made in Press Conferences are objective and non-partisan.

Assessment: Largely met

Comments:

The research activities of Statec call for a special dissemination policy. The distinction between statistical results and the outcome of analyses and forecasts has to be made very clear in order to avoid confusion among users.

As mentioned above, the "Note de conjoncture" includes forecasts made by the Statec. The peer review team was of the opinion that users should be better informed on the difference between statistical data and forecasts.

It was however general consensus that statistical releases are objective and non-partisan. This view was confirmed in all discussions with users (representatives from external stakeholders).

Principle 15: Accessibility and clarity

European Statistics should be presented in a clear and understandable form, disseminated in a suitable and convenient manner, available and accessible on an impartial basis with supporting metadata and guidance.

Overall assessment:

Statec has two information portals: one dealing with the information about the organisation as such and metadata and the other is for statistical indicators. Statistical information is free of charge for all users. Statec only charges for publications and extra work needed to respond to specific requests of users. Metadata are not linked with the statistical indicators so far. Currently, Statec undertakes a project which will result in a creation of a possibility for users to find statistical indicators accompanied by metadata in a user-friendly environment.

The Users' Satisfaction Survey reflects that about 50% of users are able to find the metadata or methodological notes, whereas only 9 % have difficulties in finding. Statec has a well established system for consulting users on any issues, including quality and metadata of statistical indicators, which adds a lot to the positive perception of users expressed during the interviews.

More systematic work should be done in the field of metadata so that all statistical outputs are accompanied with methodological notes and available on the website. Currently this is implemented only for some statistical products.

Indicator 15.1: Statistics are presented in a form that facilitates proper interpretation and meaningful comparisons.

Assessment: Fully met

Comments:

In principle, users are satisfied with the way the statistical information is disseminated.

The staff is well trained on IT issues. It helps them to search for the most appropriate possibilities how to present data in order to facilitate the proper interpretation of data by users.

Indicator 15.2: Dissemination services use modern information and communication technology and, if appropriate, traditional hard copy.

Assessment: Fully met

Comments:

Statec is very flexible in this field. It provides the public with a wide range of products and services to guarantee maximum dissemination of information. Standard and tailor-made products are distributed using different means depending on the user's request. Statec is one of the first public services to launch several projects within the eGovernment programme, making as many services as possible available on-line.

Publications can be downloaded free of charge in PDF format from the website www.statistiques.lu, which is a reference portal for Luxembourg statistics. Users can also display results on a map of Luxembourg using a mapping tool provided by Statec. An advanced high-performance search tool allows internet users to create customised tables. Statec has also a large economic and statistical library open to the public.

The services of the help-desk available at Statec are very much appreciated by the public.

Indicator 15.3: Custom-designed analyses are provided when feasible and are made public.

Assessment: Fully met

Comments:

Statec produces custom-designed analysis; users are fully aware that they can order custom-designed analyses at rather favourable terms. However Statec does not make all of them publicly available, especially if the analysis is very specific and not necessarily bear a value for others.

Indicator 15.4: Access to microdata can be allowed for research purposes. This access is subject to strict protocols.

Assessment: Fully met

Comments:

Statec has strict written protocols to be signed by the researchers (a copy of the declaration was provided). Researchers have to fill in a form which asks them, among other things, to indicate the purpose for which the data will be used.

Technologically, a separate computer network for researchers is established which is protected from the access to the data bases and any other confidential information.

Indicator 15.5: Metadata are documented according to standardised metadata systems.

Assessment: Largely met

Comments:

Statec subscribed to the IMF SDDS standards and they keep up to the requirements. Otherwise, they follow the metadata requirements, which are required by the EU legislation.

Some metadata is available on the website. Statec has a clear plan to work more systematically on the metadata issue. Concrete actions have already started linking available metadata with the statistical indicators. They plan to provide their users with short metadata descriptions which will be followed by comprehensive methodological notes. In general, users are quite satisfied with the quality of metadata provided by Statec.

Indicator 15.6: Users are kept informed on the methodology of statistical processes and the quality of statistical outputs with respect to the ESS quality criteria.

Assessment: Partly met

Comments:

Methodological information for all subject matter areas is published in the statistical yearbook (available in PDF format on the portal http://www.statistiques.public.lu/fr/) and other general or specific publications.

For all the indicators published in the SDDS system, metadata are fully available on the website. A link is provided in the SDDS indicators table.

Set up of more detailed methodological information is in progress. At present approximately 20% of the tables on the statistics portal include definitions and other metadata. Detailed and structured methodological information is stored on the Intranet. These files will be rearranged and treated to make them available in a specific meta-data section on Statec website www.statec.lu.

The Users' Satisfaction Survey shows that users are satisfied with the information provided.

4. Co-ordination role of the National Statistical Institute

The statistical system of Luxembourg is rather centralised. According to the Law on Statistics one of the duties of Statec is to co-ordinate and centralise statistical information made available to public bodies according to their functions (Article 1). No statistical survey of a general interest may be performed by other public or private organisations without the prior approval of Statec (Article 7).

Despite these clear regulations Statec does not have the power to force an effective coordination between every administration and agency. Official statistics produced by other national bodies are generally not subject to official agreements with the NSI and these bodies have their own agendas for statistical planning, production and dissemination (Questionnaire on institutional set up of official statistical service in Member States, March 2007).

Ad hoc statistical production exists in the fields of environment, schooling and education, and social security. The ministries in charge of these domains have set up their own statistical services.

The co-operation between Statec and the Luxembourg Central Bank in compiling the Balance of Payments is based on a law ("Loi du 28 juin 2000 portant modification de l'arrêté grand-ducal modifié du 10 novembre 1944 relatif au contrôle des changes"). In addition a well established (but unofficial) dialog takes place also in other matters of common interest.

As far as the dissemination of statistical data is concerned the co-ordination by Statec is well established and highly appreciated by users. Statec is responsible for the management and maintenance of the reference portal for Luxembourg www.statistiques.lu. This portal is run in collaboration with other public services and makes all kind of statistical material (not only the one produced by Statec) easily accessible to the public.

HIGHER STATISTICAL COUNCIL

This Council is established by Law on Statistics (Article 1) and has to play a consultative role for Statec. The mission, composition and organisation of this council are set out in a Grand-Ducal regulation ("Règlement grand-ducal du 29 mars 1974 concernant le Conseil supérieur de la statistique exerçant des fonctions consultatives auprès du Service central de la statistique et des études économiques").

The main task of the Council is to express an opinion on Statec's annual programme. At the end of each year, Statec submits a report on work accomplished during the year and a work programme for the year to come to the council for appraisal. Its power is limited to advisory functions (see http://www.statec.public.lu/en/statec/CSS/index.html).

The general perception is that the Council in practice is not really functioning as a platform to achieve better co-ordination. At present there is little substantial discussion of the work programme and the feedback to the Statec is negligible.

In all the interviews carried out there was full consensus that the Council needs a major reform. The institutional dialog with major stakeholders has to be intensified.

5. GOOD PRACTICES TO BE HIGHLIGHTED

A close cooperation with neighbouring (regional) statistical offices was already started in 1974. What is called the Greater Region comprises Saarland, Lorraine, Luxembourg, Rhineland-Palatinate and Wallonia. As an outcome of this cooperation (see http://www.grande-region.lu/flash_version.aspx) a number of publications are issued and some research was done aiming at improving the comparability of statistical results.

The specific statistical portal for the Greater Region mentioned above is available since the end of 2006 and makes access to data easy. Because of the economic and social interdependencies between the regions the availability of such an information platform across national borders is very valuable for policy makers and the public.

Since early 2006 it has been possible to consult the NACE codes attributed to legal units by Statec on the Ministry of Economy and Foreign Trade companies' portal (http://www.entreprises.public.lu).

6. RECOMMENDATIONS OF THE PEER REVIEW TEAM

First priority should be given to the efforts to get a new legislation which is fully in line with the principles of the Code of Practice drafted, discussed and passed. In this context the institutional set-up of Statec needs to be re-examined carefully.

If a clear separation of the production of European Statistics and the modelling and forecasting activities is not stipulated in the new legislation the new law should request a clear distinction as far as the dissemination of results is concerned. Whereas full compliance with the Code of Practice should be mandatory for European Statistics different rules could apply for example for forecasting results. The pre-release of forecasts does not conflict with the Code of Practice as long it is made clear to the non-professional user also that these results do not belong to official statistics.

In the medium term a systematic process of audits for all statistical projects should be installed. External experts (also from neighbouring regions), academics and main users should be invited to participate in reviewing statistical methods and the quality of processes in detail. The findings and recommendations of these reviews ought to be published. The availability of such reports could help to improve quality and increase the trust of users in the reliability of results considerably.

The size and the distribution as well as the development of the response burden should be monitored systematically. The results of this exercise should be made public.

Providing some feedback to households and enterprises participating in surveys could help to reduce unit- and item-non-response and could improve the quality of the answers given.

A better endowment with resources (and human resources in particular) would facilitate the realization of the improvement measures already planned by Statec.

7. LIST OF IMPROVEMENT ACTIONS BY PRINCIPLE OF THE CODE

Principle 1: Professional Independence Improvement actions	Timetable	
Efforts to get the new legislation which Statec is preparing drafted, discussed and passed. The principles of the CoP should be mentioned in the law explicitly.	Mid 2009	
Prepare an intensive communication process with main stakeholders on the new legislation.	2009 ongoing	
Extend the annual report to cover all statistical activities (Statec and other producers) which are part of the ESS and use it as a management tool for a better co-ordination. Progress reports should be made available.	2009 ongoing	
Inclusion of a policy in the case of mis-use of statistical results into the mission statement. *	Mid 2008	
Principle 2: Mandate for Data Collection Improvement actions	Timetable	
Continued and intensified efforts to enable access to administrative data free of charge on the basis of special agreements.	2008 ongoing	
Full access to administrative data for statistical purposes should be made possible by the new legislation (in particular with respect to fiscal data)	Mid 2009	
Principle 3: Adequacy of Resources Improvement actions	Timetable	
Formulation of a medium term business plan based on the medium term statistical program.	Starting 2009	
Extension of the existing training to systematic quality management, dissemination strategies and the like.	Starting 2008	
Principle 4: Quality commitment Improvement actions	Timetable	
Implementation of the Common Assessment Framework (CAF model) – a self assessment tool for public administration.	Starting 2008	
Reinforce the tools and means to monitor product quality regularly. Quality guidelines have to be finalised and made known to the public.	Starting 2008	
Reinforce training sessions on quality issues for Statec staff.	Starting 2008	
Review of key statistical outputs also relying on external experts.	Starting 2008	
Feedback actions as a means for motivating respondents and thus increasing quality ${\color{red} \bigstar}$	Starting 2008	
Principle 5: Statistical Confidentiality Improvement actions	Timetable	
Publication of the existing guidelines on statistical confidentiality in the production and dissemination processes.	Mid 2009	
Making the handbook on statistical confidentiality in production of statistics available to the public.	Mid 2009	

Principle 6: Impartiality and objectivity Improvement actions Development and implementation of a policy in order to make the distinction between statistical data and forecast even clearer. Making the system of pre-access to data under embargo transparent to the general public. Improvement of access to metadata for all products. An English version of metadata is of particular importance. Establish standards on how to proceed in the case of serious errors. This policy document should be published. Strengthening of the public awareness of the SDDS release calendar. The release calendar should cover a period of more than 4 month in advance. The concept of "impartiality and objectivity" has to be explicitly foreseen in the reform of the Luxembourg NSI statistical law.	Timetable Mid 2008 Mid 2008 2008 ongoing 2009 2008 ongoing Mid 2009
Principle 7: Sound Methodology Improvement actions Intensify cooperation with the research community and other NSIs. Promote the application of "sound methodology" at the level of the Advisory Body ("Conseil supérieur de la statistique") Creation of an administrative coordination commission where methodology issues could be discussed (in the context of the project reforming the Luxembourg NSI statistical law).	Timetable 2008 ongoing 2009 ongoing Mid 2009
Principle 8: Appropriate Statistical Procedures Improvement actions Further development of the Quality Management System at Statec, with a focus on the generalisation and standardisation of the description of processes and documentation.	Timetable 2008 ongoing
Principle 9: Non-Excessive burden on respondents Improvement actions Creation of an administrative coordination commission of all public producers. in the context of the project of reforming the Luxembourg NSI statistical law, with a view to improve the coordination of surveys. Monitoring the response burden of firms should be systematically and regularly. The results of this exercise should be made public.	Timetable Mid 2009 2010
Reinforce electronic means of reporting in order to increase timeliness and to reduce the response burden. Within the context of the cooperation aiming at establishing a standardised approach of data collection (chart of accounts) between Statec, the administrative business registers and the Ministry of Justice: Discussions on the use of the XBRL format for the transmission of accounting data should be enforced and cooperation with companies and software producers should be developed as soon as the legal framework is adopted.	2009 ongoing 2008 ongoing

Principle 10: Cost Effectiveness

Improvement actions Timetable

Promote the paperless transmission of data in order to reduce manual encoding of data. 2008 ongoing

Principle 11: Relevance

Improvement actions Timetable

Carry out user satisfaction surveys on a regular basis (but not annually). 2009

Principle 12: Accuracy and Reliability Improvement actions

Timetable

Development and publication of quality reports and indicators as part of the work program.

2008 ongoing

Principle 13: Timeliness and Punctuality

Improvement actions Timetable

Standardized review of the implementation of the annual work program with special reference to timeliness and punctuality of all major statistical products on a regular basis.

2008 ongoing

Principle 14: Coherence and Comparability

Improvement actions	Timetable

Intensify and promote work on coherence and comparability in the context of existing or new internal working groups.

2008 ongoing

The new legislation should aim at strengthening the coordination role and improve coherence within the system.

Mid 2009 ongoing

Principle 15: Accessibility and clarity

with the statistical figures to all users

Improvement actions	Timetable
Intensify the process of informing users of major changes in key statistical products. Increase the visibility of revisions.	2008 ongoing
Systematic training in statistical literacy. Increase the visibility of revisions.	2008 ongoing
Make an English version of "STATEC" and "Statistics Portal" Internet Websites accessible.	2008 – 2009
To elaborate metadata for all statistical outputs and disseminate them together	2008 ongoing

8. ANNEX A: PROGRAMME OF THE VISIT

Agenda of the visit of the peer review team

Monday 17th december 2007 - Discussion with internal stakeholders

Start	End	Торіс	Participants	
09 h 30 -	10 h 15	Welcome	S.Allegrezza	
		Introduction of programme - Organisational matters	N.Weydert	J.Langers
		Short general description of the Luxembourgish statistical system	G.Schuller	M.Origer
10 h 15 -	11 h 40	Meeting with management and senior staff		
		Principle 1 – Professional Independence	S.Allegrezza	F.Hansen
		Principle 2 – Mandate for Data Collection	J.Langers	L.Gzella-Gargano
		Principle 3 – Adequacy of Resources	G. Schuster	D.Schroeder
			G. Genson	A. Hoffmann
11 h 40 -	11 h 55	Break		
11 h 55 -	12 h 30	Meeting with management and senior staff		
		Principle 5 – Statistical Confidentiality	N.Weydert	N. Weyer
			A. Hoffmann	L. Maretti
			S.Allegrezza	
12 h 30 -	13 h 20	Meeting with management and senior staff		
		Principle 6 – Impartiality and Objectivity	S.Allegrezza	G. Schuller
			J.Langers	
13 h 20 -	14 h 00	Lunch break		
14 h 00 -	14 h 30	Meeting with management and senior staff		
		Principle 15 – Accessibility and Clarity	G.Zacharias	M.Bissener
			F.Adam	
14 h 30 -	15 h 15	Interview with Directors and quality manager		
		Principle 4 - Quality Commitment	S.Allegrezza	N.Weydert
			J.Langers	G.Schuller
1E	16 5 20	Maratina with imica staff	M.Origer	M.Kafaï
151115 -	10 11 30	Meeting with junior staff	0 DI#-	O II Disserie
		Principles 1-6 and 15	S.Plazzotta	C.H.Dimaria
			MJ.Difino	G.Zangerlé
16 h 30 -	16 h 40	Broak	C.Hanten	V.Sinner
16 h 40 -		Presentation of the new statistical law	S.Allegrezza	P.Gonzalez
101140 -	10 11 00		•	
		Presentation on strategic considerations	G.Zacharias	M.Kafaï

Tuesday 18th december 2007 - Discussion with external stakeholders

Start End	Торіс	Participants	
09 h 15 - 09 h 30	Presentation of the websites (Statec & Portal)	G.Zacharias	P.Gonzalez
		M.Kafaï	
09 h 30 - 11 h 00	Meeting with other national data producers	C.Wampach	R.Lindenlaub
		J.Ries	G.Schmitz
11 h 00 - 11 h 10	Break		
11 h 10 - 12 h 40	Meeting with main data users / with the Higher	M.Michels	G.Heinrich
	Statistical Council representatives	N.Dondelinger	
12 h 40 - 14 h 00	Lunch break		
441-00 441-40	M - 8 70 8 1 - 8	postponed to	
14 n 00 - 14 n 40	Meeting with media representatives	19.12.2007	
14 h 40 - 15 h 20	Meeting with other ministries representatives	T.Theves	
15 h 20 - 15 h 30	Break		
	Meeting with representatives of respondants/data		
15 h 30 - 16 h 10	providers	G. Buchler	S. Young
		P.Steffes	
16 h 10 - 16 h 50	Meeting with the research community	F.Aka	C. Wehenkel

Wednesday 19th december 2007 - Conclusions

Start	End	Topic	Participants	
09 h 30 -	10 h 30	Meeting with management to sum-up and detailed review of list of improvement actions for all	Unit managers	P.Gonzalez
		principles		M.Kafaï
10 h 30 -	11 h 30	Meeting with media representatives	R.Meyer	
11 h 30 -	11 h 40	Break		
11 h 40 -	13 h 10	Meeting with top-management: conclusions,	S.Allegrezza	J.Langers
		ommendations and follow-up (improvement ions)	N.Weydert	M.Origer
			G.Schuller	

9. ANNEX B: LIST OF PARTICIPANTS

List of participants

Statec

Top Management

Serge Allegrezza - Director General
Nico Weydert - Head of division A - General Services

Jean Langers - Head of division B - Social Statistics

Marc Origer - Head of division C - National Accounts, Economics,

Enterprises

Guy Schuller - Head of division D - International Economics Relations

Management

Guy Zacharias - Head of unit A1 - Dissemination, Public Relations
Laurent Maretti - Head of unit A2 - Information Technology
Denise Schroeder - Head of unit A3 - Budget, Human Resources
Mike Hartmann - Head of unit A4 - Register of Enterprises
Paul Zahlen - Head of unit A5 - Library, Training

Patricia Gonzalez - Head of unit A6 - Central Balance Sheet Office

Quality Delegate

Jérôme Hury - Head of unit B1 - Consumer Prices, Housing

Lilianne Reichmann - Head of unit B2 - Labour Statistics
Armande Frising - Head of unit B3 - Wages, Labour Costs

Germaine Thill - Head of unit B4 - Demography, Household Expenditure

John Haas - Head of unit C1 - National Accounts

Ferdy Adam - Head of unit C2 - Economic Forecasts and Model Lucia Gzella-Gargano - Head of unit C3 - Enterprises, Agriculture, R&D, New

Economy

Frank Hansen - Head of unit C4 - Short Term Indicators, Transports,

Tourism

Alain Hoffmann - Head of unit D1 - International Trade Statistics
Gilles Genson - Head of unit D2 - Foreign Direct Investment

Guy Schuster - Head of unit D3 - Balance of Payments - data collection
Nico Weyer - Head of unit D4 - Balance of Payments - production

Mike Bissener - C1 - National Accounts Mehran Kafaï - C1 - National Accounts

Quality Delegate

Junior Staff

Susanna Plazzotta - A3 - Human Resources

Marie-Jeanne Difino - A1 - Dissemination, Public Relations Cédric Hanten - D2 - Foreign Direct Investment

Georges Zangerlé - C3 - Enterprises Charles-Henri Di Maria - C1 - National Accounts

Véronique Sinner - C2 - Economic Forecasts and Model

Peer Review Team

Josef Richter - Nominated by Statistics Austria

Christine Coin - Eurostat

Daiva Norkeviciene - Statistics Lithuania

Higher Statistical Council - Main Data Users

Norry Dondelinger - Chambre des métiers / Chamber of Trades

Marc Michels - CGFP (Confédération Générale de la Fonction Publique)

/ General Conferderation of Public Administration

Georges Heinrich - Ministry of Finance

Other national data producers

Jean Ries - ADEM (Administration De l'Emploi) / Administration of

employment

Claude Wampach - CSSF (Commission de Surveillance du Secteur

Financier) / Commission for the Supervision of the

Financial Sector