

# **Light Peer Review of the Implementation of the European Statistics Code of Practise in Turkey**

**Final report**

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## Preface

The light peer review (LPR) of the Turkish Statistical Institute (TurkStat) was undertaken in the framework of the Eurostat funded project ‘Global assessments of statistical systems of candidate and potential candidate countries as well as ENP countries’. The company ICON-INSTITUT Public Sector GmbH, under contract with Eurostat, was responsible for organising all activities and tasks relating to the LPR.

Light peer reviews are based on the structure and procedures of the ESS (European Statistical System) peer reviews and are designed for candidate and advanced potential candidate countries. The objectives of these reviews are, in particular, to assess compliance of the reviewed National Statistical Institute (NSI) with Principles 1-6 and 15 of the European Statistics Code of Practice, to evaluate the coordination role of the NSI within the statistical system, to highlight transferable practices suitable to foster compliance with the Code of Practice and to recommend improvement actions needed in view of fully complying with the Code.

The review process was initiated by Eurostat at the request of TurkStat made in January 2010. The review was conducted by the two experts Mr. Günter Kopsch (former Director in DESTATIS, Germany) who was the leading expert and Mr. Richard Laux (Director in the UK Statistics Authority). The review mission took place from 24 May to 27 May 2011 (*see Annex 1*). Besides the two experts, Ms. Claudia Junker and Mr. Piotr Ronkowski (both from Eurostat) participated in this mission. Written material was made available by TurkStat in advance and during the assessment mission (*including Annex 2*). The review mission was also prepared through replies to the self-assessment questionnaire sent out in advance to TurkStat.

The peer review team very much appreciated the well-prepared meetings and the openness of the communication both with the staff of TurkStat and with representatives from partner and stakeholder organisations. It is hoped that the review will be of benefit to the further development of TurkStat.

## Executive Summary

- (1) The main goal of this Light Peer Review (LPR) was to evaluate the compliance of the Turkish Statistical Institute (TurkStat) with selected principles of the European Statistics Code of Practice, to support the further improvement of TurkStat.
- (2) The peer review team found good evidence of TurkStat's progress with regard to the institutional aspects of the Code and the accessibility of its statistical information. The team felt that TurkStat's leadership and staff at all levels were enthusiastic and committed to their activities and the development of TurkStat. All stakeholders interviewed noted that significant improvements have been achieved in TurkStat's work and its standing in Turkey during the last few years.
- (3) The Statistics Law of Turkey specifies the importance of quality considerations in TurkStat's work, and the peer review team noted that TurkStat staff were committed to quality. However, the team felt that considerations of quality were rather narrow and piecemeal, and that substantial further work was required – in the context of implementing a Total Quality Management system – to ensure that 'quality' is the focus of all of TurkStat's activities.
- (4) TurkStat's engagement with users and its approach to the dissemination of its statistical information are areas that the peer review team felt would benefit from systematic review, with the intention of providing a genuine (statistical) information service to the many interested stakeholders in Turkey and beyond. Closer engagement with a range of users to understand better their uses of TurkStat's statistics will help to orient quality management, to explain the main messages in statistical releases, and to explain the strengths and limitations of the statistics in relation to their likely uses. The peer review team had useful meetings with a selection of users, and feels that an investment in helping users to articulate their needs would pay dividends for the development of TurkStat as a service provider.
- (5) The Statistics Law of Turkey specifies the legal basis for the production and dissemination of official statistics and also for the organization of the system of official statistics of Turkey. From the discussions with the management and stakeholders of TurkStat the peers felt that TurkStat produces and disseminates official statistics in ways that respect the principles of professional independence, impartiality and objectivity, and statistical confidentiality. However, an amendment of the Statistics Law appears to be necessary to ensure better representation of the private sector and civic society in the Statistical Council.
- (6) The Statistics Law of Turkey provides TurkStat with a clear and broad legal mandate to collect and access the data needed for the execution of the Statistical Programme. Response rates in statistical surveys are relatively high, although there are increasing problems in business statistics. To reduce the response burden of businesses TurkStat has introduced the means for electronic data collection via the internet for some business surveys. In addition to the legal provisions enabling access to administrative data sources for statistical purposes, TurkStat has signed several protocols with public institutions that are owners of such data. Whilst a wide variety of administrative data is already used by TurkStat, the need to further increase the use of administrative data for statistical purposes is very clearly recognized by TurkStat and is a clear objective of the office.
- (7) The peers felt that TurkStat can largely perform its current tasks with the available financial, staff and IT resources, and that these are probably sufficient for the additional

development activities which would lead to compliance with European requirements. Nevertheless, significant efforts by TurkStat are needed to produce and transmit to Eurostat the full range of statistical data required by European Regulations. Significant efforts are also needed to improve data quality and to implement a quality management system, and to intensify and broaden user consultation. More staff and financial resources would help to accelerate the processes. There seems also to be scope for an increase in the efficiency of TurkStat, in the context of the implementation of Total Quality Management.

(8) TurkStat produces the large majority of Turkey's official statistics, and the Statistics Law establishes some important features of the wider co-ordination role – in relation to the Statistical Council, the Official Statistics Programme, a statistical release calendar, and the provision of support in relation to methods and quality.

(9) TurkStat's management expressed its clear intention to take further steps towards compliance with the European Statistics Code of Practice. The peer review team discussed the improvement actions planned (listed in Chapter 5) with the top management and senior staff members of TurkStat. These actions are fully supported by the team as a whole.



# 1 FINDINGS PER PRINCIPLE

## 1.1 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

By virtue of Article 16 of the Statistics Law of Turkey (Law No. 5429, approved 10.11.2005, published in the Official Gazette at 18.11.2005, No. 25997), the Turkish Statistical Institute (TurkStat) is ‘organized under the Prime Ministry and the Prime Minister may delegate its authorities regarding the management of the Institute to a State Minister in case he sees necessary’ (which delegation is done, in practice). The Law explicitly stipulates (in Article 17) the scientific and technical autonomy of TurkStat ‘in regard to data sources, selection of statistical methods and procedures; form, content and time of dissemination; and observance of statistical confidentiality’. In addition a by-law on ethics for the public service stipulates that public officials should act in accordance with equity and integrity. The President of the Institute reports to the Prime Minister. The Statistics Law also gives a strong role to TurkStat in the planning process of the 5-year Statistical Programme and its yearly revisions.

The legal status of a statistical office with regard to professional independence is a prerequisite for being able to fully comply with the Independence Principle of the Code of Practice. It is not, however, a guarantee. The professional independence of the producers of official statistics also has to be accepted in practice, in particular by the Government. From the discussions of the peer review team with the management and other staff of TurkStat as well as with members of the Statistical Council and with representatives of various user groups the peers gained the impression that TurkStat acts independently in practice and that there is no political interference.

### 1.1.1 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.

Article 1 of the Statistics Law of Turkey describes the purpose of the Law as ‘... to determine basic principles and standards concerning the production and organisation of official statistics; and to regulate the formation, duties, and authorities of the Turkish Statistical Institute which is to compile and assess data and information, produce, publish and disseminate statistics on the area that country needs, and to ensure coordination among ...’. According to Article 4 of the Law ‘... statistics produced within the scope of the Official Statistics Programme shall be prepared and implemented in accordance with the principles of reliability, consistency, impartiality, statistical confidentiality, timeliness and transparency’. Article 17 of the Law specifies the professional independence of TurkStat from external interference in producing and disseminating official statistics.

**1.1.2 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.**

The hierarchical level of TurkStat's President is comparable to the highest ranking public servants. He has a sufficiently high standing to enable access to policy authorities and administrative public bodies. It helps that he is directly accountable to the Prime Ministry.

The Statistics Law provides the President of the Institute with a fixed term mandate (with the possibility of a renewal for a second term) and protects him against inappropriate dismissal during his term of office. This further strengthens the institutional safeguards of the professional independence of TurkStat. The President is appointed by a decision of the Council of Ministers on the basis of a recommendation of the State Minister responsible for TurkStat. The required qualification is clearly stated in the Statistics Law. However, TurkStat has been led for about three years by an acting President - who is, at the same time, one of the Vice-Presidents. That means that the present head of TurkStat is not protected against a sudden and inappropriate dismissal. It is strongly recommended by the peers that the post be filled again very soon, not least because of the preparation of the next multiannual programme (which started some time ago) and other upcoming issues that need strategic decisions to be taken by the President.

**1.1.3 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.**

According to Article 22 of the Statistics Law, the President of TurkStat is the highest level of authority in the Institute. He is 'mandated and authorised to deliver and oversee the Presidency services in line with the relevant legislative provisions (which include, as mentioned above, the professional independence of TurkStat), Official Statistics Programme ...' The President is also the chair of the Statistical Council.

Those interviewed during the peer review confirmed that the legal rules with regard to the professional independence of TurkStat are fully applied in practice.

**1.1.4 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.**

Article 17 of the Statistics Law of Turkey explicitly stipulates the independence of TurkStat, which is headed by the President, with regard to data sources, selection of statistical methods and procedures, and form, content and time of dissemination. According to Article 18 of the Law it is one of the duties and authorities of TurkStat 'to determine the statistical methods, definitions, classifications and standards to be used in the production of official statistics in line with national and international norms' and 'to analyse and publish statistics in the field of economy, social issues, demography, culture, environment, science and technology, and in the other required areas'.

Those interviewed during the peer review imparted a positive picture of TurkStat's independent data compilation and dissemination activities.

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

The process of planning the Official Statistics Programme is regulated in Article 3 of the Statistics Law of Turkey. The Programme is drafted by TurkStat for a term of five years in line with the comments of the Statistical Council, is submitted to the Council of Ministers for adoption, and is then published in the Official Gazette. Amendments during the term of the Programme are possible. The other producers of official statistics are involved in the planning process in permanent working groups which are established in various areas of statistics. It appears, however, that there is room for increased involvement of the private sector of the economy and of the society in general in the planning process. The peer review team recommends therefore the development of a more formalised and integrated means of improving consultation with all user groups - in particular the private sector of the economy, the scientific community, and the society at large - in the preparation of the 5-year Programme and its yearly revisions (see improvement action under Principle 11). Together with a new Statistical Programme TurkStat is currently developing its new Strategic Plan, for 2012 – 2016. The top management of TurkStat prepares annual monitoring reports on the implementation of the Programme including the statistics produced by other public institutions. These reports are submitted to the Statistical Council and are published.

The present composition of the Statistical Council does not reflect the composition of TurkStat's stakeholders. The private sector of the economy and society in general are clearly underrepresented. The peer review team recommends initiating a change of the Council's composition. Pending the necessary change to the Law representatives of users from the private economy and society could be invited as guests.

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

Statistical releases published by TurkStat include very little commentary, strictly limited to a pure description of the statistical figures. The releases that the peer reviewers looked at did not contain any political comments, and this was confirmed in discussions with users, in particular with the media. Press conferences are normally not used to release new data.

Press releases are drafted in cooperation between subject matter and dissemination departments, following defined internal procedures. It would be useful to include in the dissemination strategy the procedures relating to the release of statistical information.

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

The peer review team was informed that TurkStat intervenes publicly in cases of the misuse or misinterpretation of TurkStat's statistics in the media. The Press Law of Turkey stipulates the complainant's right to require a correction of incorrect information in the media. It appears that an internal policy and a well established procedure on how to react exist; a written description of the policy and the procedure is, however, not yet available.

The peer review team recommends therefore the formulation and publication of an appropriate document on the website.

## 1.2 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

The Statistics Law of Turkey, in particular Articles 7 to 10, provides TurkStat with a clear and broad legal mandate to collect the data needed for the execution of the Statistical Programme, which includes data for European statistical purposes. TurkStat is entitled to collect data directly from statistical units and it is allowed to access administrative records for statistical purposes. The obligation to reply to all surveys or censuses is stipulated by the Statistics Law. The possibility to fine legal and natural persons in the case of non response is practiced only sometimes, because TurkStat prefers to have good relations with respondents and to convince businesses and private households of the importance of statistics. Regarding the use of administrative data TurkStat has signed, in addition to the legal provisions, several protocols with public institutions that are owners of such data.

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

Article 7 of the Statistics Law of Turkey stipulates that ‘in censuses and surveys ..., the Presidency (*of TurkStat*) is authorized to request directly the data and information which are deemed necessary for the production of official statistics, in all mediums and from all statistical units, in the form, period and standards specified by the Presidency’. The Presidency is moreover ‘authorized to investigate and control the accuracy of information or data, request additional information ...’ The rights of the statistical units are laid down in Article 15 of the Statistics Law, in particular the right to ask for information concerning the purpose and coverage of the census or survey and the measures taken to ensure the confidentiality of the data. The scope and content of the statistical censuses and surveys are determined in the Statistical Programme.

To reduce the response burden of businesses TurkStat has implemented electronic data collection via the internet for some business surveys. Investigations are planned on the possibility of gathering data for large businesses directly from their accounting systems. In household surveys and in price statistics computer assisted interview techniques are used.

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

TurkStat has the legal right to access administrative data. According to Article 9 of the Statistics Law “the institutions and organizations are obliged to submit or open to use of the Presidency the records and other data files they compile process and store regarding their working areas”. Article 10 says moreover: “Institutions and organizations are obliged to establish, update and open to the statistical use of the Presidency their national register systems regarding their working areas in line with the standards defined by the Presidency”. Despite these strong legal provisions TurkStat states in its self-assessment that ministries and other institutions are not in all cases allowed to provide data. The reason is that in at least one case there is a contradiction between the law on which the collection of these administrative data is based, and the Statistics Law. The most important example seems to be that some data owned by the Revenue Administration of the Ministry of Finance, which would be highly relevant to the production of short term business statistics, structural business statistics and national accounts, have not been submitted to TurkStat. The reason is that the tax law explicitly lists the institutions to which the data may be provided, and TurkStat is not mentioned. The need to find a solution is in principle agreed between the institutions; the translation onto action is, however, still lacking. It is recommended that a general review take place of legislative barriers to accessing administrative data, and that steps be taken to change existing laws or to find other solutions, as appropriate.

Although a large variety of administrative data is already used by TurkStat, the need to further increase the use of administrative data for statistical purposes is very clearly recognized by TurkStat and is a clear objective of the office. TurkStat has agreed some protocols with providers of administrative data; further protocols should be agreed. TurkStat should further investigate how it can support Ministries and other public bodies to properly run their administrative data files, and how its influence on the content of administrative data sources can be further strengthened. Moreover TurkStat should be provided with the metadata for the administrative data they use.

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

Article 54 of the Statistics Law of Turkey includes rules that all reporting units can be fined if they fail to submit requested data to TurkStat within the time frame specified, or if they submit incomplete or incorrect information. The instrument is, however, only used sometimes. It appeared that 40 sanctions were imposed in 2010. The reason is that response rates are relatively high, despite the fact that there are increasing problems in business statistics. TurkStat tries instead, in particular with their staff in the regional offices, to intensify its cooperation with businesses, stressing the importance of statistics and so seeking to convince them to respond.

## 1.3 Principle 3: Adequacy of Resources

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

## Overall assessment

According to the discussions with TurkStat's top management as well as with middle management and junior staff, with members of the Statistical Council, and with various user groups it appears that TurkStat can fulfill its tasks to a large extent with the available financial, staff and IT resources. The present number and qualifications of staff and the budget seem to be sufficient for the current work of TurkStat, and it seems to be adequate to some extent for the fulfillment of the additional development activities which would lead to compliance with European requirements. The IT infrastructure has been modernized during the last years with the help of European development projects.

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

TurkStat had a substantial increase in its resources over the last ten years, and its resources were not cut during the international financial crisis. It can seek additional resources for new demands, including for new European requirements. Many of the users interviewed mentioned the visible progress that TurkStat has made during the last few years.

Nevertheless, as the 2010 SMIS+ report indicates, significant efforts are still needed from the side of TurkStat to produce and transmit to Eurostat the full range of statistical data required by European Regulations in statistics, and to fully apply European methods in their compilation, in particular in the fields of National Accounts and Agriculture Statistics. Significant efforts are also needed to improve data quality and to implement a quality management system, and to intensify and broaden user consultation. A further increase of the staff and financial resources would help to accelerate the processes. An increase of TurkStat's resources would also be needed for the fulfillment of demands for more data at a sub-national level.

There seems also to be room for an increase in the efficiency of TurkStat by, for example, implementing an improved Human Resources Policy, making more use of information already available in the public sector, and the better coordination of the statistical system.

With regard to staff capacities some positive aspects can be mentioned. In general staff appear to be well educated: nearly 90% of the permanent staff have university degrees and more than 45% of the staff have a good knowledge of the English language.

The salary situation in TurkStat is comparable with other public institutions. The turnover of staff is only a problem for the office in the area of ICT. TurkStat has its own Research and Training Center which offers a broad variety of training measures, partly conducted by university teachers.

## 1.4 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 (ESS).**

### Overall assessment

Article 4 of the Statistics Law of Turkey (no. 5429) says that “statistics produced within the scope of the Official Statistics Programme shall be prepared and implemented in accordance with the principles of reliability, consistency, impartiality, statistical confidentiality, timeliness and transparency ... all relevant information and methods used ... shall be made public in order to allow the evaluation of the quality of official statistics”. Article 41 of the Law established a Data Quality Control Board to “evaluate and examine ... statistical work ... in terms of ... scientific quality and compliance with international standards ... and to perform quality control studies if needed”. An associated By-Law on the establishment of the Data Quality Control Board and its working procedure and principles envisages the Board meeting monthly. However, TurkStat’s top management informed the peer review team that the Board has not yet become functional; instead the decision had been taken to build processes of co-ordination and co-operation informally. However, the Board would be implemented during the 2012-16 programming period.

The peer review team suggests that during the 2012-16 programming period there should be a major focus on starting to implement the EFQM, adapted to meet the needs of TurkStat as appropriate. The peer review team further suggests that this investment in EFQM should be a stimulus for TurkStat to develop a suite of:

- related quality policies, procedures and strategies (relating to quality management (including quality assurance, and quality guidelines), quality reporting, etc); and
- associated supporting policies, procedures and strategies relating to, for example: user engagement and stakeholder relations; staff satisfaction, human resources; confidentiality, and dissemination.

TurkStat should then develop and implement relevant action plans.

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

Regular product quality reporting was initiated in 2000, and now covers the majority of statistical outputs. Some outputs have not been reported upon, such as the calculation of sampling variability for some business survey estimates: it might be helpful for TurkStat specialists to discuss unresolved methodological questions, for example about calculating estimates of sampling variability, with Eurostat. The peer review team was informed that top management’s consideration of the reports led to improvements, such as identifying



thresholds for suppressing small cells in tables to avoid disclosivity. Top management expressed that users did not use existing quality information, although users seemed aware of existing quality information and the methodological explanations accompanying statistical releases and detailed data tables. TurkStat top management is committed to improving statistical literacy; the peer review team suggests that a ‘user conference’ about statistical quality (in the context of EFQM) be a priority, and that the conference be used to develop a ‘quality action plan’, to be introduced into the Strategic Plan at the earliest opportunity.

The peer review was told that some methodological changes had resulted in discontinuities in key economic statistics time series, and that TurkStat has not produced sufficiently long consistent back series to meet users’ needs for econometric modeling. The peer review team suggests that TurkStat discuss the issue of ‘revisions’ with users at the proposed conference, and then develop and implement an appropriate revisions strategy.

Where TurkStat has calculated sampling variability but has not developed standard quality reports, the peer review team was told that the information is anyway published.

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

TurkStat’s management informed the peer review team that internal audit, self-assessment and quality reporting processes are used to monitor the quality of all stages of the statistical production process.

#### **1.4.3 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.**

TurkStat’s management told the peer review team that it does not have formal processes in place in relation to, for example, trade-offs within quality; instead informal, non-standard processes exist. The peer review team was also told that planning arrangements for new surveys are not formalized. The peer review team suggests that information about trade-offs within quality, and planning arrangements for new surveys, be published, whilst TurkStat develops suitable formal processes; this could usefully include an explanation as to why flash estimates (of GDP) are not produced, to stimulate informed debate with users.

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

TurkStat’s management informed the peer review team that their quality considerations are embedded in the goals and objectives within the Second Strategic Plan (2012-2016). TurkStat’s Training and Research Centre (TRC) offers modules in, for example, household surveys and business surveys, and each of these includes some consideration



of quality issues, though the TRC does not offer training courses about statistical quality more generally. Junior staff told the peer review team that some of them – ‘experts’ – had access to training about TQM, but that training about statistical quality was not available. The peer review team suggests that a module about ‘statistical quality’ be developed by TRC, and offered to all staff involved in statistical production.

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

TurkStat’s top management told the peer review team that only a minority of outputs had been the subject of detailed reviews involving external experts (for example, key statistical domains - such as the National Accounts, and Consumer Price Index - have been the subject of a Review of Standards and Codes (ROSC)), but that each of these had resulted in an action plan; the peer review team was also informed that a majority of outputs had been the subject of other reviews. Action plans are typically not published. A recent Public Financial Management and Control Law had stimulated the need to better integrate strategic planning, business planning, and financial management. The peer review team suggests that TurkStat establish internal auditing and internal control systems.

It also appeared that academics at the universities in Ankara were keen to work with TurkStat to assist with complex survey methodological issues. Hence, it could be useful for TurkStat methodologists to meet academicians from universities to explore the scope for external methodological input.

### 1.5 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 strictly observed by TurkStat, and is enshrined in the Statistics Law and associated legislation. Rules and procedures about confidentiality are publicized; confidentiality protection seemed to be well understood by users, staff, and other producers of official statistics. Statutory penalties exist, though there have been no reported cases of breach of confidentiality and so the penalties have not been applied in practice.

### 1.5.1 Indicator 5.1 Statistical confidentiality is guaranteed by law.

Article 13 of the Statistics Law establishes a confidentiality framework covering the protection of confidential data, disclosivity, transfer of confidential data, and the use of confidential data. The Law specifies that data used to compile foreign trade statistics are subject to passive confidentiality - that is, the data are not considered confidential unless the data subject (the statistical unit) explicitly asks for them to be treated as confidential. Other relevant legislation includes the By-Law on Data Confidentiality in Official Statistics and Principles and Procedures Regarding Confidential Data Security, and the Turkish Criminal Code (article 258).

### 1.5.2 Indicator 5.2 Statistical authority staff signs legal confidentiality commitments on appointment.

TurkStat staff sign a declaration when appointed.

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

Staff breaching the provisions of Article 13 of the Statistics Law are liable to fines imposed under Article 258 of the Turkish Criminal Code No. 5237. TurkStat's top management mentioned that such an occurrence had not happened.

### 1.5.4 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.

Guidelines for the protection of statistical confidentiality, relating to TurkStat's staff and those of other data producers, are published on TurkStat's website. When TurkStat contacts survey respondents, it spells out its protection of confidentiality clearly.

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

TurkStat uses a variety of means to protect confidentiality - including the legal framework, a dedicated 'network security' team, technical provisions, and office security systems. These means appear to have contributed to a culture in which security is taken seriously by all staff. It seems that their IT systems – for checking tables for possible disclosivity, and for statistical data transfers – require modernization. The peer review team supports TurkStat's suggestions of developing generic software for applying data confidentiality rules, and establishing an automated process management system across the office in order to improve data security.

### 1.5.6 Indicator 5.6 Strict protocols apply to external users accessing statistical micro-data for research purposes.

TurkStat grants access to both household and business survey micro-data in line with the provisions of Article 14 (“use of individual data”) of the Statistics Law. This requires information that may lead to the direct or indirect identification of individuals to be obscured. Business survey micro-data is made available to a number of organizations for scientific purposes. Applications for access to micro-data are made in writing. Successful applicants access the data in TurkStat Headquarters; they are strictly supervised, work on stand-alone computers, and their outputs are checked by TurkStat experts before they are allowed to take copies away. The peer review team suggests that TurkStat publishes on its website the conditions governing access to business survey micro-data, and the associated procedures, and bring this information to the attention of potential users of the service.

Household micro-data is anonymised by removing direct identifiers, and by making the data available only at a geographical level that protects confidentiality – for example, the quarterly LFS files are only available at the national level, whilst the annualized file contains regional identifiers. Such ‘public use’ files are available to buy, and as part of this arrangement purchasers sign a commitment relating to the appropriate use of the micro-data. The peer review team suggests that TurkStat experts liaise with Eurostat to ensure that they are aware of international best practice in the provision of household survey micro-data.

## 1.6 Principle 6: Impartiality and Objectivity

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

### Overall assessment

Observations made during the LPR provided reasonable assurance that TurkStat respects scientific independence in producing and disseminating official statistics and that it carries out its tasks in an objective manner. Neither the impartiality nor the objectivity of the Institute were questioned at any stage of the LPR but were rather confirmed by all groups of users interviewed. The practices in ensuring equality of access to newly released data as well as the publication of an advance release calendar for all official statistics of Turkey are to be underlined as exemplary. Equal access is explicitly laid down in Article 12 of the Statistics Law of Turkey; the release calendar in the Statistical Programme.

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

The Statistics Law of Turkey stipulates that TurkStat's staff can act independently, free from any instructions from outside, in the implementation of the Statistical Programme. Though TurkStat mentions in its self-assessment that some media institutions criticized the results of labour force statistics, price statistics and National Accounts, all stakeholders interviewed during the LPR, including representatives of the media, felt confident that TurkStat compiles statistics on an objective basis determined by statistical considerations.

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

TurkStat is in close and regular contact with international organizations about its methodological work. The peer review team was told that the use of internationally accepted standards and methodological recommendations is part of the culture of the Institute. Those stakeholders interviewed confirmed their trust in the professionalism of TurkStat's staff. Indicator 6.3: Errors discovered in published statistics are corrected at the earliest possible date and publicised. If errors are identified in a published statistics they are corrected and users informed immediately by a press release. The internal document describing the procedures to be followed in case of errors should be published on TurkStat's website. Staff are made aware that they will be fined if they cause such errors, which is in the view of the peers not conducive to creating a culture in the office where errors can be and are admitted.

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

Article 4 of the Statistics Law of Turkey stipulates: "All relevant information and methods used in producing official statistics shall be made public in order to allow the evaluation of the quality of official statistics and their compliance with the principles". TurkStat states in its self-assessment and explained during the LPR that almost all of the data on its website are accompanied by standardized metadata. Metadata are updated whenever necessary. Moreover, TurkStat intends to develop a further harmonized metadata system for all business processes in close contact with Eurostat's SDMX group.

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

At the beginning of each year TurkStat publishes an advance release calendar for all official statistics - not only for the statistics produced by TurkStat. The publication of the national data release calendar is stipulated by the Official Statistics Programme and is in addition mentioned in the Statistics Law of Turkey. Any change of a pre-announced publication date in the release calendar seems to be published in advance as early as possible for reasons of transparency. Users confirmed that the release of TurkStat's statistics have had to be postponed only very rarely. It is recommended that the Dissemination Strategy be reviewed to explain clearly the circumstances in which a pre-announced publication date can be changed and how the new date will be published.

### 1.6.6 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.

The principle that all users have equal access to statistical releases at the same time is laid down in Article 12 of the Statistics Law of Turkey and applied in practice by TurkStat. This approach seems to be generally accepted with users. The peer review team was told that there have not been any occurrences of information divulged prior to its official release (leaks) in recent years.

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

TurkStat's press releases are strictly objective and non-partisan. The little commentary that they include is strictly limited to a pure description of the figures. New statistical data are not normally presented in press conferences. Internal procedures are in place on how to prepare and approve press releases; these should be included in the Dissemination Strategy or in a separate document on TurkStat's website.

## 1.7 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

TurkStat presents its statistics clearly and accessibly, although its statistical releases could be made more informative. All of its statistical releases are published on its website, and in English and are accompanied (via links) to supporting metadata. However, the website itself requires further development to enhance its accessibility and functionality.

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

Statistical releases typically include headline text, some commentary, and summary tables; more detailed tables are available separately. Users seemed satisfied with the statistical releases. The peer review team felt that the statistical releases could be made more informative, and by doing so they would increase user interest and strengthen trust in TurkStat. For example, the LFS release could include international and regional comparisons, and longer time series. The peer review team suggests that TurkStat review its Dissemination Strategy to reflect the importance of providing more useful information – including comparisons, graphs and maps, and improved commentary – in statistical releases; and publish a plan setting out when this aspect of the strategy will be implemented. Junior staff told us that they typically do not write press releases, but that style guides and templates were available, along with support from their managers.

Whilst the statistical information published by other producers than TurkStat are mainly part of the Official Statistics Programme, some of them also publish other statistical information – that is to say, non-official statistics. This may confuse users about issues such as standards. The peer review team therefore suggests that TurkStat consider the use of a labeling system to clearly indicate those statistical releases that are part of the Official Statistics Programme.

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

All of TurkStat's statistical releases, tables and databases are made available via the internet, free of charge. Only tailor-made requests are charged for. The website is available in both Turkish and English, and is relatively easy to navigate. However, TurkStat told the peer review team that it intended to improve aspects of the functionality associated with using databases, and search functions, by using a semantic approach. The peer review team suggests that TurkStat improve the functionality and accessibility of its website, in liaison with users and potential users. TurkStat should also take the opportunity of this website upgrade to include all official statistics at the time of publication – as already happens in some cases – in order to provide users with a 'one stop shop'.

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

TurkStat provides custom-designed analyses, though the peer review team was told that these are never made public.

**1.7.4 Indicator 15.4: Access to micro-data can be allowed for research purposes. This access is subject to strict protocols.**

Access to micro-data see Principle 5, Indicator 5.6.

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

Most statistical releases are accompanied by metadata, available on the website. Current metadata systems are static; TurkStat is working with Eurostat's SDMX group to harmonize its metadata further, and that it is developing standardized systems as part of rolling out common business processes.

**1.7.6 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.**

Users are kept informed about methodology and quality via metadata available on TurkStat's website; changes are described at the time that the changed statistics are released. Some users felt that the available metadata was lacking some key information that was important to them. The peer review team suggests that TurkStat review the scope of its metadata to ensure that it covers international comparability, quality indicators, and details of methodology, as appropriate. TurkStat should also review its metadata systems to ensure that changes to statistical methods, including an indication of the effects of the changes, can be announced in advance of the new statistics. The peer review team further suggests that TurkStat take the opportunity of the proposed 'user conference', as a means of building links with users, and understanding their perspective on 'quality'.

The peer review team was informed of the problems arising from compiling statistics about an economy in which about 40% of employment is in the informal sector. TurkStat should therefore review the relevant metadata to ensure that these aspects are clarified, bringing out the implications for the quality of key estimates, and plans to improve statistical measurement.

## 2 Co-ordination role of the National Statistical Institute

**The statutory responsibility for meeting the Turkish Official Statistical Programme rests with TurkStat, which is itself responsible for about 85% of all official statistics in Turkey – including most of those required by the EU. Nearly all household surveys are conducted by TurkStat; only some small business surveys are conducted by other institutions such as the Central Bank and Ministry of Finance. The Statistics Law also requires TurkStat to play a leading role in methods and quality across the statistical system.**

The (statutory) Statistical Council also facilitates co-ordination. Technically part of TurkStat, it is chaired by the President of TurkStat, and comprises senior officials from a number of government departments and agencies, the Governor of the Central Bank of Turkey, and private sector and academic representatives. The Council advises on the Statistical Programme, and on areas of official statistics where future work may be required; it meets at least once a year, whilst standing sub-groups take specific issues forward. The peer review team got the impression that the Council's discussions are dominated by the needs of government users; this was reinforced by non-government users who felt that they lacked the opportunity to influence the Statistical Programme. Nevertheless, it seems clear that the Council's activity has helped to greatly improve the coherence and integration of the statistical system.

Complementing Council discussions, the peer review team was told that bilateral discussions between producers and TurkStat take place.

Most of the remaining 15% of Turkish official statistics are produced by the following organizations: the Turkish Central Bank, Undersecretary of Treasury and the ministries responsible for finance, agriculture, education, health, energy, the interior, industry, labour and social security, justice, transportation, culture & tourism and the environment, and also some other public and private institutions. Many producers see advantages in having their statistics produced as part of the Official Statistics Programme, because it lends their statistics credibility and profile.

TurkStat operates within a framework of agreements ranging in formality with the organizations listed above. For example, a protocol between TurkStat, and the Ministry of Agriculture and Rural Affairs sets out the principles and procedures for the co-operation required to develop a pilot Farm Accountancy Data Network in nine provinces of Turkey.

As well as its responsibility for developing and implementing the Statistics Program, TurkStat's role in co-coordinating the producers of official statistics covers the following activities:

- Training – The Training and Research Centre offers training to staff working for other producers of official statistics.



- Forward publication timetable – TurkStat publishes an advance release calendar for all official statistics.
- Methods and quality – TurkStat offers its expertise to other producers - for example in relation to international standards (education), registers (farm and businesses), and classifications (health), but does not monitor the methods used or quality of other producers' statistics. See Principle 4, references to the Data Quality Control Board.
- International co-ordination – TurkStat co-ordinates the supply of statistical information to Eurostat. In recent years TurkStat has provided technical assistance to the following countries: Mongolia, Kazakhstan, Kyrgyzstan, Turkmenistan, the occupied Palestinian territory, the Turkish Cypriot community, Kosovo under UNSCR 1244/99, Jordan, Moldova, Tajikistan and Azerbaijan. Main topics covered include: agriculture and fisheries statistics, business statistics, population censuses, and environmental statistics and classifications as well as IT, and publication standards.

### 3 Good practices to be highlighted

The Statistics Law not only regulates the production and dissemination of official statistics by TurkStat, it also regulates the production and dissemination of all official statistics by all producers of official statistics. It therefore also includes rules on the coordination of the statistical system.

The Statistics Law stipulates that official statistical data shall be available to all users in an equal way and at the same time. Exceptions are not permitted.

TurkStat publishes a national release calendar for all official statistics, not only those produced by TurkStat.

## 4 List of Improvement Actions by Principle of the Code

### 4.1.1 Improvement Actions Principle 1: Professional Independence

Improvement actions	Timetable
Prepare and publish a document describing TurkStat's policy of intervening publicly on statistical issues in cases of the public misuse or misinterpretation of official statistics.	2011
Initiate a change of the composition of the Statistics Council to better reflect the composition of the stakeholders of TurkStat.	TurkStat will propose changes to the existing Law within 3 years

### 4.1.2 Improvement Actions Principle 2: Mandate for Data Collection

Improvement actions	Timetable
Sign agreements with further providers of administrative data, clarifying the mandate and committing to improving the quality of administrative records.	2011 - 2013
Review existing legislative barriers to accessing administrative data and take steps to change existing laws, as appropriate.	2011 - 2013

### 4.1.3 Improvement Actions Principle 3: Adequacy of Resources

Improvement actions	Timetable
Implement IPA 2011 ICT Project "Upgrading Information and Communication Technologies Services of TurkStat".	2013 – 2014
Develop and start to implement a TurkStat Human Resources Policy.	2012

#### 4.1.4 Improvement Actions Principle 4: Quality Commitment

<b>Improvement actions</b>	<b>Timetable</b>
Develop a TQM concept on the basis of the EFQM model adapted to the needs of TurkStat.	2012
Develop a suite of <ul style="list-style-type: none"> <li>- related quality policies, procedures and strategies (relating to quality management including quality assurance, and quality guidelines, quality reporting, etc.); and</li> <li>- associated supporting policies, procedures and strategies relating to, for example: user engagement and stakeholder relations; staff satisfaction and human resources; confidentiality, and dissemination.</li> </ul>	2012-2014
Organize a ‘user conference’ about statistical quality and use it to develop a quality action plan	2012
Discuss the issue of ‘revisions’ with users at the proposed conference, and then develop and implement an appropriate revisions strategy	2012
Prepare a standardized quality report template for TurkStat.	2012
Publish TurkStat’s quality reports for main subjects.	2012-2016
Develop and publish formal processes regarding trade-offs within quality and planning arrangements for new surveys	2012
Develop a training module about ‘statistical quality’	2013
Establish internal auditing and internal control systems	2014
Discuss with academics at the Universities in Ankara the scope for methodological input	2012
Make Data Quality Control Board functioning	2016

#### 4.1.5 Improvement Actions Principle 5: Statistical Confidentiality

<b>Improvement actions</b>	<b>Timetable</b>
Develop generic software to enable data confidentiality rules to be applied consistently	2014
Establish an automated process management system across the office in order to improve data security	2014
Publish on the website the conditions governing access to business survey micro-data, and the associated procedures	2011
Liaise with Eurostat to ensure that TurkStat's experts are aware of international best practices in the provision of household survey micro-data.	2011

#### 4.1.6 Improvement Actions Principle 6: Impartiality and Objectivity

<b>Improvement actions</b>	<b>Timetable</b>
Publish the (internal) document setting out how TurkStat proceeds if errors in published data are discovered.	2011

#### 4.1.7 Improvement Actions Principle 7: Sound Methodology

<b>Improvement actions</b>	<b>Timetable</b>
Publish a strategy setting out how TurkStat will improve methodologies used by other producers of official statistics.	2014

#### 4.1.8 Improvement Actions Principle 8: Appropriate Statistical Procedures

<b>Improvement actions</b>	<b>Timetable</b>
Adapt the Generic Statistical Business Process Model in TurkStat .	2014

#### 4.1.9 Improvement Actions Principle 11: Relevance

<b>Improvement actions</b>	<b>Timetable</b>
Publish and implement a strategy to enhance consultation with all users in the preparation of the 5- year Programme and its yearly revisions.	2012
Publish a document setting out how users' needs will be prioritised in the 5- year Programme.	2012

#### 4.1.10 Improvement Actions Principle 12: Accuracy and Reliability

<b>Improvement actions</b>	<b>Timetable</b>
Calculate sampling errors and non-sampling errors for TurkStat's key statistical indicators, in line with ESS Quality Standards.	2011 - 2015

#### 4.1.11 Improvement Actions Principle 13: Timeliness and Punctuality

<b>Improvement actions</b>	<b>Timetable</b>
Investigate the feasibility of improving the timeliness of key economic statistics, in discussion with users and data providers .	2013

#### 4.1.12 Improvement Actions Principle 15: Accessibility and Clarity

Improvement actions	Timetable
Review the Dissemination Strategy to reflect the importance of providing more useful information – including comparisons, graphs and maps, and improved commentary – in statistical releases; publish a plan setting out when this aspect of the strategy will be implemented.	2011 - 2012
Develop a new and more user friendly web-site in liaison with users and potential users of the web-site.	2013
Include all official statistics in TurkStat’s web-site at the time of publication in order to provide users with a ‘one stop shop’.	2012 – 2016
Consider the use of a ‘labelling system’ to clearly indicate those statistical releases that are part of the Official Statistics Programme.	2016
Review the scope of TurkStat’s metadata to ensure that it covers international comparability, quality indicators, and details of methods, as appropriate.	2012 – 2013
Review the metadata systems to ensure that changes to statistical methods, including an indication of the effects of the changes, can be announced in advance of the new data.	2012 – 2013
Review the relevant metadata to ensure that the problems arising from compiling statistics in an economy with a very large non-observed economy are clarified, bringing out the implications for the quality of key estimates, and plans to improve statistical measurement.	2014 – 2015

## 5 Annexes

- 5.1 Agenda of the LPR
- 5.2 Official Statistics Act