



INTERNATIONAL MONETARY FUND
WASHINGTON, D. C. 20431

CABLE ADDRESS
INTERFUND

June 16, 2006

Statistical Reform Team
Room 3/07
HM Treasury
1 Horse Guards Road
London SW1A 2HQ
United Kingdom
Fax: (44) (0) 207-5110
Email: statsconsultation@hm-treasury.gov.uk

Dear Sirs/Mesdames:

This is in response to your letter of March 22, 2006, requesting comments on the consultation document with proposals for independence for statistics. The comments we offer on this important document represent the views of the staff of the IMF's Statistics Department and do not necessarily represent those of the IMF or IMF policy.

We agree that reform should seek to ensure that statistics make a crucial contribution to good government and that their compilation and dissemination be supported by independence, integrity, and the highest professional standards. At the same time, we recognize that institutional arrangements vary across countries, reflecting differences in national conditions.

The proposals' focus on institutional soundness is consistent with our views on data quality. Indeed, a prerequisite of quality in the Data Quality Assessment Framework (DQAF) approved by the IMF Executive Board is a legal and institutional environment supportive of statistics. As you may be aware, we have been using this framework in recent years to formulate the assessments in the data module of the Report on the Observance of Standards and Codes (ROSC) for over 60 countries, including a few G-8 countries. Prior to implementation, it might be useful for the authorities to evaluate proposals against best practices using the DQAF. While it is dataset specific, guidance for assessing institutional arrangements and integrity is common for all datasets, with relevant materials available through the IMF website: <http://www.imf.org/external/np/sta/dsbb/2003/eng/dqaf.htm>.

We welcome the proposal to legislate the independence of statistics in the U.K. While the arrangements under the *Framework of National Statistics* have worked well on a nonstatutory basis, cementing them into legislation offers the prospect of enhanced credibility. Passage of this legislation would signal a more permanent and robust basis for the already strong assurances of integrity in statistical activity, which is free from political interference.

It is our view that statistical quality would be enhanced by solidifying the independence of the Chief Statistician, who should be accountable only to Parliament. While other governance arrangements have worked well in other countries, strengthening the independence of the Chief Statistician should help ensure that statistical decisions remain appropriately insulated from any perception of outside interference.

We are prepared to support data sharing for statistical purposes only, subject to stringent safeguards. These would include protecting the confidentiality of individuals and organizations from unauthorized disclosures of information, including through the establishment of penalties with strong deterrent capacity.

The proposed use of a robust code of practice to assess the quality of the statistical process could assist in promoting the maintenance of high standards throughout the statistical system. Such assessments would be similar to those conducted by the Fund in the preparation of data ROSCs. It is worth noting that both the U.K.'s National Statistics Code of Practice and the DQAF are rooted in the United Nation's Fundamental Principles of Statistics.

Finally, I would like to take this opportunity to reiterate our commitment to supporting further improvement in the macroeconomic statistics of the United Kingdom and to wish you the best in your efforts toward this end.

Sincerely yours,

Robert W. Edwards
Director
Statistics Department

Attachment

cc: Mr. Scholar, Executive Director, IMF
Mr. Michael Deppler, Director, European Department, IMF
Ms. Susan M. Schadler, Deputy Director, European Department, IMF
Mr. James Morsink, Division Chief, European Department, IMF

DQAF—GENERIC FRAMEWORK (July 2003)

(continued)

Quality Dimensions	Elements	Indicators
	<p>3.2 Assessment of source data—<i>Source data are regularly assessed.</i></p> <p>3.3 Statistical techniques—<i>Statistical techniques employed conform to sound statistical procedures.</i></p> <p>3.4 Assessment and validation of intermediate data and statistical outputs—<i>Intermediate results and statistical outputs are regularly assessed and validated.</i></p> <p>3.5 Revision studies—<i>Revisions, as a gauge of reliability, are tracked and mined for the information they may provide.</i></p>	<p>3.2.1 Source data—including censuses, sample surveys, and administrative records—are routinely assessed, e.g., for coverage, sample error, response error, and nonsampling error; the results of the assessments are monitored and made available to guide statistical processes.</p> <p>3.3.1 Data compilation employs sound statistical techniques to deal with data sources.</p> <p>3.3.2 Other statistical procedures (e.g., data adjustments and transformations, and statistical analysis) employ sound statistical techniques.</p> <p>3.4.1 Intermediate results are validated against other information where applicable.</p> <p>3.4.2 Statistical discrepancies in intermediate data are assessed and investigated.</p> <p>3.4.3 Statistical discrepancies and other potential indicators or problems in statistical outputs are investigated.</p> <p>3.5.1 Studies and analyses of revisions are carried out routinely and used internally to inform statistical processes (see also 4.3.3).</p>
<p>4. Serviceability</p> <p><i>Statistics, with adequate periodicity and timeliness, are consistent and follow a predictable revisions policy.</i></p>	<p>4.1 Periodicity and timeliness—<i>Periodicity and timeliness follow internationally accepted dissemination standards.</i></p> <p>4.2 Consistency—<i>Statistics are consistent within the dataset, over time, and with major datasets.</i></p> <p>4.3 Revision policy and practice—<i>Data revisions follow a regular and publicized procedure.</i></p>	<p>4.1.1 Periodicity follows dissemination standards.</p> <p>4.1.2 Timeliness follows dissemination standards.</p> <p>4.2.1 Statistics are consistent within the dataset.</p> <p>4.2.2 Statistics are consistent or reconcilable over a reasonable period of time.</p> <p>4.2.3 Statistics are consistent or reconcilable with those obtained through other data sources and/or statistical frameworks.</p> <p>4.3.1 Revisions follow a regular and transparent schedule.</p> <p>4.3.2 Preliminary and/or revised data are clearly identified.</p> <p>4.3.3 Studies and analyses of revisions are made public (see also 3.5.1).</p>
<p>5. Accessibility</p> <p><i>Data and metadata are easily available and assistance to users is adequate.</i></p>	<p>5.1 Data accessibility—<i>Statistics are presented in a clear and understandable manner, forms of dissemination are adequate, and statistics are made available on an impartial basis.</i></p> <p>5.2 Metadata accessibility—<i>Up-to-date and pertinent metadata are made available.</i></p> <p>5.3 Assistance to users—<i>Prompt and knowledgeable support service is available.</i></p>	<p>5.1.1 Statistics are presented in a way that facilitates proper interpretation and meaningful comparisons (layout and clarity of text, tables, and charts).</p> <p>5.1.2 Dissemination media and format are adequate.</p> <p>5.1.3 Statistics are released on a preannounced schedule.</p> <p>5.1.4 Statistics are made available to all users at the same time.</p> <p>5.1.5 Statistics not routinely disseminated are made available upon request.</p> <p>5.2.1 Documentation on concepts, scope, classifications, basis of recording, data sources, and statistical techniques is available, and differences from internationally accepted standards, guidelines, or good practices are annotated.</p> <p>5.2.2 Levels of detail are adapted to the needs of the intended audience.</p> <p>5.3.1 Contact points for each subject field are publicized.</p> <p>5.3.2 Catalogs of publications, documents, and other services, including information on any changes, are widely available.</p>

Data Quality Assessment Framework

DQAF

A Factsheet

The IMF Data Quality Assessment Framework (DQAF) identifies quality-related features of governance of statistical systems, statistical processes, and statistical products. It is rooted in the UN Fundamental Principles of Official Statistics and grew out of the Special Data Dissemination Standard (SDDS) and General Data Dissemination System (GDDS), the IMF's initiatives on data dissemination. The DQAF incorporates their good practices and is the result of intensive consultations.

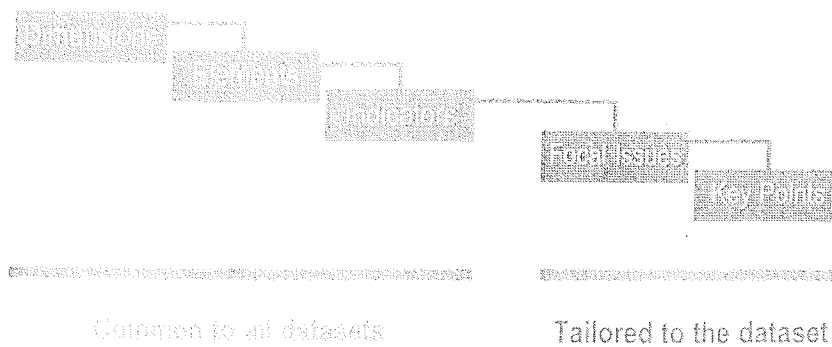
The DQAF provides a structure for assessing existing practices against best practices, including internationally accepted methodologies. It has proved to be valuable for at least three groups of users.

- To guide IMF staff on the use of data in policy evaluation, preparing the data module of Reports on the Observance of Standards and Codes (ROSCs), and designing technical assistance.
- To guide country efforts e.g., to prepare self-assessments.
- To guide data users in evaluating data for policy analysis, forecasts, and economic performance.

Content of the Framework

The DQAF's coverage of governance, processes, and products is organized around a set of prerequisites and five dimensions of data quality—assurances of integrity, methodological soundness, accuracy and reliability, serviceability, and accessibility.

For each dimension, the DQAF identifies 3-5 elements of good practice, and for each element, several relevant indicators. Further, in a cascading structure, more detail and more concreteness tailored to the dataset are provided by focal issues and key points.



DQAF—GENERIC FRAMEWORK (July 2003)

Quality Dimensions	Elements	Indicators
<p>0. Prerequisites of quality</p>	<p>0.1 Legal and institutional environment—<i>The environment is supportive of statistics.</i></p> <p>0.2 Resources—<i>Resources are commensurate with needs of statistical programs.</i></p> <p>0.3 Relevance—<i>Statistics cover relevant information on the subject field.</i></p> <p>0.4 Other quality management—<i>Quality is a cornerstone of statistical work.</i></p>	<p>0.1.1 The responsibility for collecting, processing, and disseminating the statistics is clearly specified.</p> <p>0.1.2 Data sharing and coordination among data-producing agencies are adequate.</p> <p>0.1.3 Individual reporters' data are to be kept confidential and used for statistical purposes only.</p> <p>0.1.4 Statistical reporting is ensured through legal mandate and/or measures to encourage response.</p> <p>0.2.1 Staff, facilities, computing resources, and financing are commensurate with statistical programs.</p> <p>0.2.2 Measures to ensure efficient use of resources are implemented.</p> <p>0.3.1 The relevance and practical utility of existing statistics in meeting users' needs are monitored.</p> <p>0.4.1 Processes are in place to focus on quality.</p> <p>0.4.2 Processes are in place to monitor the quality of the statistical program.</p> <p>0.4.3 Processes are in place to deal with quality considerations in planning the statistical program.</p>
<p>1. Assurances of integrity</p> <p><i>The principle of objectivity in the collection, processing, and dissemination of statistics is firmly adhered to.</i></p>	<p>1.1 Professionalism—<i>Statistical policies and practices are guided by professional principles.</i></p> <p>1.2 Transparency—<i>Statistical policies and practices are transparent.</i></p> <p>1.3 Ethical standards—<i>Policies and practices are guided by ethical standards.</i></p>	<p>1.1.1 Statistics are produced on an impartial basis.</p> <p>1.1.2 Choices of sources and statistical techniques as well as decisions about dissemination are informed solely by statistical considerations.</p> <p>1.1.3 The appropriate statistical entity is entitled to comment on erroneous interpretation and misuse of statistics.</p> <p>1.2.1 The terms and conditions under which statistics are collected, processed, and disseminated are available to the public.</p> <p>1.2.2 Internal governmental access to statistics prior to their release is publicly identified.</p> <p>1.2.3 Products of statistical agencies/units are clearly identified as such.</p> <p>1.2.4 Advance notice is given of major changes in methodology, source data, and statistical techniques.</p> <p>1.3.1 Guidelines for staff behavior are in place and are well known to the staff.</p>
<p>2. Methodological soundness</p> <p><i>The methodological basis for the statistics follows internationally accepted standards, guidelines, or good practices.</i></p>	<p>2.1 Concepts and definitions—<i>Concepts and definitions used are in accord with internationally accepted statistical frameworks.</i></p> <p>2.2 Scope—<i>The scope is in accord with internationally accepted standards, guidelines, or good practices.</i></p> <p>2.3 Classification/sectorization—<i>Classification and sectorization systems are in accord with internationally accepted standards, guidelines, or good practices.</i></p> <p>2.4 Basis for recording—<i>Flows and stocks are valued and recorded according to internationally accepted standards, guidelines, or good practices.</i></p>	<p>2.1.1 The overall structure in terms of concepts and definitions follows internationally accepted standards, guidelines, or good practices.</p> <p>2.2.1 The scope is broadly consistent with internationally accepted standards, guidelines, or good practices.</p> <p>2.3.1 Classification/sectorization systems used are broadly consistent with internationally accepted standards, guidelines, or good practices.</p> <p>2.4.1 Market prices are used to value flows and stocks.</p> <p>2.4.2 Recording is done on an accrual basis.</p> <p>2.4.3 Grossing/netting procedures are broadly consistent with internationally accepted standards, guidelines, or good practices.</p>
<p>3. Accuracy and reliability</p> <p><i>Source data and statistical techniques are sound and statistical outputs sufficiently portray reality.</i></p>	<p>3.1 Source data—<i>Source data available provide an adequate basis to compile statistics.</i></p>	<p>3.1.1 Source data are obtained from comprehensive data collection programs that take into account country-specific conditions.</p> <p>3.1.2 Source data reasonably approximate the definitions, scope, classifications, valuation, and time of recording required.</p> <p>3.1.3 Source data are timely.</p>

The Bank for International Settlements used the DQAF to analyze its International Financial Statistics.

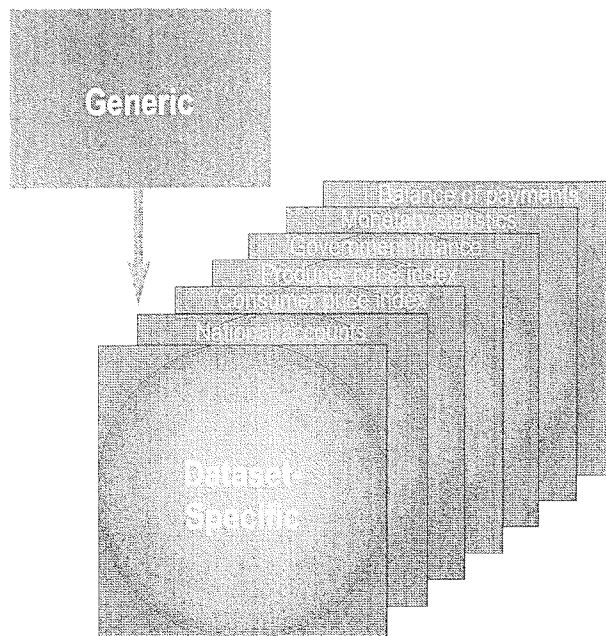
The Banque du Liban used the DQAF to prepare a self-assessment of its macroeconomic data.

Other international users of the DQAF

The Eurostat - ECB Task Force on Quality assessed euro area balance of payments and international investment position statistics against the DQAF.

The Census and Statistics Department of the Hong Kong SAR experimented with the DQAF to conduct a self-assessment of balance of payments statistics.

The generic DQAF, at the right, serves as the umbrella for the dataset-specific frameworks. To date, the IMF has developed the DQAF for six macroeconomic datasets. Others have been developed or are underway, several in cooperation with the World Bank and other international organizations.



These documents can be downloaded from <http://dsbb.imf.org/> (go to DQRS). French, Portuguese, Russian, and Spanish translations are available. The DQAF July 2003 updates the original July 2001 version.

Use of the Framework in the IMF

The DQAF is the organizing model of the data module Report on the Observance of Standards and Codes (ROSC). To prepare a ROSC, at the invitation of the authorities, a team of experts spends about two weeks in dialogue along the lines of the DQAF with the country officials. The resulting ROSC consists of three parts: a Summary Assessment by the IMF, Response by the Authorities, and Detailed Assessments by dataset of the elements and the DQAF indicators.

To date, 36 data ROSCs have been published. They cover a broad mix of industrial and developing countries, including Botswana, Canada, Costa Rica, Estonia, France, Hungary, India, Jordan, Mexico, Mozambique, Sri Lanka, South Africa, Tanzania, Turkey, Ukraine. <http://dsbb.imf.org/> (go to DQRS).