



REPUBLIC OF CYPRUS

**CODE OF PRACTICE FOR THE COLLECTION,
PUBLICATION AND STORAGE OF STATISTICAL DATA**

STATISTICAL SERVICE



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Code of Practice for the Collection, Publication and Storage of Statistical Data

The scope of this document is to cite the specific actions and the precautions that have to be taken in every stage of handling statistical data, in order to safeguard statistical confidentiality.

1. Legal Framework

The legal framework governing statistical confidentiality is provided by the Statistics Law, No. 15(I) of 2000. Article 13, which is quoted below, lays down the provisions according to which data are regarded as confidential, the manner in which such data shall be disseminated, the potential of gaining access to such data for research purposes, the written declaration ensuring confidentiality and the penalties foreseen in case of a breach.

13 (1) (a) The data collected and processed by the Statistical Service for the production of statistics are considered as confidential as long as they allow the direct or indirect identification of statistical units and disclose personal data:

Provided that data which have been gathered from sources which are accessible to the public are not considered as confidential.

For the purposes of this section “personal data” means data concerning natural or legal persons.

(b) A statistical unit is identified directly by its name and address or by a registration number which has officially been granted to it.

(c) A statistical unit is identified indirectly if it is possible to ascertain its identity in a manner other than that which is provided in paragraph (b). In order to ascertain whether a statistical unit may be identified indirectly, all the means shall be considered which may reasonably be used for the identification of the specific statistical unit.

(2) It is possible to have access to confidential statistical data which allow the indirect identification of statistical units following the permission of the Director, where these statistical data are necessary for specific scientific research programmes the results of which do not disclose specific statistical units and will not be used for commercial purposes.

(3) The statistics compiled on the basis of the data resulting from a survey shall be published in such a manner as to render impossible the direct or indirect disclosure of the identity of those who provided the data or of the persons to whom the data relate.

(4) All the data collected during a survey or work shall continue to be considered as confidential, despite that the statistical results of the specific survey or work have been published.

(5) (a) *The persons referred to in subsection (1) of section 11 have the obligation to make a confirmation in accordance with the form set out in the Appendix, that they shall not disclose information which they have received during the conduct of the survey. This obligation continues to exist after the termination of their professional relationship with the service for which they have collected the information.*

(b) Any person who violates the provisions of paragraph (a) is guilty of an offence and in case of conviction is liable to a fine not exceeding two thousand five hundred sixty two euros or to imprisonment for a term not exceeding two years or to both such fine and imprisonment.

2. Collection of Statistical Data

In the process of collecting data, the highest responsibility, in terms of protecting confidentiality, lays with the authorised (by the Statistical Service) persons in charge of collecting data (permanent or temporary staff). The supervisor of each survey has to inform accordingly all the staff under his/her responsibility and to ensure that the following provisions are fully respected:

- 2.1 During the training of staff and for every survey, the provisions of the Statistics Law of 2000 relating to data collection should be clearly outlined. According to the Law (article 11, subsection 2) the staff have the obligation to inform the person from whom the provision of data is required about:
 - (a) the conduct of the survey or activity by virtue of the law,
 - (b) the purpose of the survey or activity,
 - (c) statistical confidentiality,
 - (d) the penalties imposed in case of refusing to provide the data requested or in case of providing false, incomplete or inaccurate data.
- 2.2 The staff ought to be adequately informed that disclosing data received, either orally or in writing, to non authorised persons is prohibited. Special attention should be given when data is collected during a personal interview. The interview must not take place in the presence of third parties and, during the interview, questionnaires involving other statistical units should not be exposed in any way. Additionally, interviewers should not discuss about data or information obtained from another person or enterprise.
- 2.3 It is forbidden to disclose confidential data even after the termination of employment of the person working in a specific survey and, generally, in the Statistical Service.
- 2.4 Each interviewer or person in charge of collecting or/and processing data has to:
 - (a) take, in his/her own responsibility, an oath before the Registrar of any District Court within a week from the completion of his/her training.
 - (b) sign the confirmation envisaged by the Law concerning the observance of statistical confidentiality, and also to
 - (c) sign the solemn statement that he/she is advised of the Statistics Law with all its provisions and penalties.

The above mentioned sworn statement (confirmation) is necessary for all personnel (permanent and temporary) and needs to be taken only once. The solemn statements of the interviewers will be signed for every survey in which they participate at the same time with the signing of their contract. Afterwards and within 10 days, these solemn statements need to be submitted to the Registry, under the responsibility of the person in charge of the survey. Samples of the confirmation and the solemn statement are included in annex A (pages 8 and 9).

- 2.5 The interviewer, in every meeting with a person that will be required to provide data, has to carry with him the special identification (authorisation) card from the Statistical Service that is valid for a specific time period. If employment is terminated before the end date, then this card should be immediately returned to the Statistical Service.

All the above apply also to the staff engaged in the data entry of questionnaires and other documents.

3. Publication of Statistical Data

Publication of statistical data is defined as any kind of dissemination, either by paper publications or by electronic means (webpage, e-mail etc.) or by direct data delivery to interested users by any means.

The provisions laid down in order to safeguard statistical confidentiality at this stage of handling statistical data are the following:

- 3.1 Publication of aggregated data in tables can be done with no problem when:
 - (a) The number of statistical units concerned is at least three.
 - (b) The number of statistical units is less than three and the appropriate consent of these units for publishing the data has been obtained beforehand. This consent may be sought, for example, in the cases of products of special significance and interest to the public. The relevant form for obtaining the consent of the sampling units concerned, as well as a sample of the letter to be addressed to them by the Statistical Service, are included in annex B (pages 10 and 11).
 - (c) Cells at a lower level of disaggregation are merged in order to increase the number of statistical units in a certain stratum.
 - (d) The statistical units concerned are government administrations and services, semi-government organisations or public companies.
- 3.2 Publishing data at the lowest level of a classification (e.g. at the fifth-digit level of NACE) should be avoided so as to minimise the risk of a possible matching of the data with the statistical units that have provided them.
- 3.3 The Business Register may be made available to the public under certain conditions. It should not include variables such as the number of persons employed or the turnover, but only the name, the address and the economic activity of each enterprise. The register to be made available to the public should comprise only companies limited, official partnerships and joint ventures. Sole proprietors are not to be included.

3.4 The release of information that includes confidential data may be permitted for research purposes under the following conditions:

- (a) Interested parties have to fill in the special form shown in annex C (page 12) in order to apply for the data to the Director of the Statistical Service. The application submitted needs to include the following information, which will constitute the criteria upon which a decision for releasing or not the requested data will be based:
 - (i) Details of the applicant: educational institution, research organisation, business enterprise, private individual, etc.
 - (ii) Description of the research project, use of the data requested, potential users.
 - (iii) Description of the data requested and justification of the need for using confidential data.
 - (iv) Precautionary measures taken by the applicant in order to safeguard statistical confidentiality during data processing.
 - (v) Description of the expected output to be published and means of its dissemination.

The applicant should also include a statement declaring that the data will not be used for any further purpose, will not be made available to third parties and will be disposed by destruction once the research project is completed.

- (b) The application form will be forwarded to the inter-service Confidentiality Committee, which, after examining it, will provide its recommendation to the Director by filling in the special form attached in annex C (page 13). The whole process, from receiving the application until the Director's decision, should not exceed one month, provided that the application received had been properly completed.
- (c) The data set that will finally be supplied according to the Director's decision should not exceed what is absolutely essential for the research project and, in any case, should not include the names of the statistical units concerned.
- (d) In those cases where the preparation of the data set to be given entails a cost, this will be determined by the current pricing policy relating to the provision of confidential data for research purposes.

3.5 The dissemination of confidential data to the Statistical Service of the European Union (Eurostat) is stipulated in the Statistics Law as follows:

«Notwithstanding any provision of this Law, the transmission of confidential data to the Statistical Office of the European Communities is permitted when these are necessary for the production of statistics of the Community» (article 15, subsection 2).

«Access to confidential data which have been transmitted to the Statistical Office of the European Communities by virtue of subsection (2) is possible/permitted only for authorized officers thereof and for authorized natural persons who work at the Statistical Office on contract; the said data shall be used exclusively for the purposes for which they have been transmitted» (article 15, subsection 3, paragraph (α)).

4. Storage of Statistical Data

The personnel of the Statistical Service ought to treat issues relevant to the storing of personal data, should these be either in paper or in electronic form, with particular caution.

- 4.1 Maximum effort should be made so as to maintain the least possible number of completed forms/questionnaires on the desks and in the offices of the staff and to keep them there only for as long as it is necessary.
- 4.2 Forms/questionnaires whose storage is deemed to be necessary should be kept locked in the storage rooms of the corresponding divisions of the Statistical Service. The key of the door should be in the possession of the head of the division or any other person authorised by him/her.
- 4.3 Forms/questionnaires of censuses should be kept for five years and afterwards their preservation should be undertaken in coordination with the State Archive. For the rest of the specialised or regular surveys, the time period of their storage will be judged on a case by case basis depending on their usability.
- 4.4 Forms/questionnaires no longer needed should be sent for recycling twice a year, in the presence of a member of staff, under the responsibility of the Registry.
- 4.5 Given the existence of proper shredding equipment, disposing of forms can be done in this way too by the office clerks.
- 4.6 Confidential data stored in electronic form should also be kept in a safe place, either in the office of the person in charge or in the storage room.
- 4.7 Staff should make sure that the procedures provided for in the IT Security Policy Handbook, developed by the Department of Information Technology Services, are appropriately followed so as to minimise the risk of a potential breach of data security. Particular attention should be paid in creating and storing back-up copies (either on CDs or on USBs), especially in those cases that these copies may need to be transferred out of the office.
- 4.8 Once their professional relationship with the Statistical Service is terminated, it is forbidden that staff extracts or deletes from the computer they had been using any data, information, files or documents it may contain, including their job-related electronic mail.

ANNEX A

Sample of the solemn statement signed by staff members
and of the confirmation provided in the Statistics Law

SOLEMN STATEMENT

I, [name and surname] with ID no.

declare that

I have taken notice of the provisions of the Statistics Law, No. 15 (I) of 2000 and
particularly of the consequences of breaching statistical confidentiality.

Survey/Activity Signature.....

Post held in the Service Date.....

The Statistics Law, No. 15(I) of 2000 (article 13(5))

CONFIRMATION

I,....., ID no., hereby confirm on oath that, in the exercise of the powers granted to me by the Statistics Law for the purpose of the conduct of a survey or work, I shall carry out a truthful and accurate collection, recording and processing of data in accordance with the provisions of the Law and any directions which may be given to me and shall not disclose to any person, apart from the Director or any other person authorized for this purpose by the Director, any information I have received during the conduct of the survey or work.

Survey/Activity

Post held in the Service

Signature

Date

Sworn and signed before me
at the District Court of
today /... / 20....

.....
The Registrar

ANNEX B

Sample letter and declaration of consent for publishing statistical data



REPUBLIC OF CYPRUS
MINISTRY OF FINANCE



STATISTICAL SERVICE
1444 NICOSIA

File No.: 05.27.005

Sir / Madam,

Publication of statistical data

According to the Statistics Law, No. 15(I) of 2000, the Statistical Service is obliged to take all necessary measures in order to assure confidentiality for the statistical data collected. Confidential data is considered to be any data that may allow the direct or indirect identification of the statistical unit and disclose personal information (article 13).

With this letter, the Statistical Service informs you that within the economic activity that your enterprise belongs according to the classification used, there exist less than three enterprises/units. Even though the Statistical Service publishes aggregated and anonymised data, there is the possibility of indirectly identifying your enterprise/unit.

Due to the usefulness of publishing data at this level of economic activity for the purpose of economic analysis, the Statistical Service requires your consent to publish these aggregated data.

Yours sincerely,

Director
Statistical Service

Address Michalakis Karaolis Str, 1444 Nicosia
Tel.: 22602130, Fax: 22661313, E-mail: enquiries@cystat.mof.gov.cy;
Web site: <http://www.cystat.gov.cy>



**Declaration of consent to the Statistical Service
for publishing statistical data**

Name of statistical unit:

Address:

Name of the person issuing the consent:

Status / Position in the statistical unit:

Date:

With this letter I declare that I give my consent to the Statistical Service for publishing or disseminating aggregated data submitted by the above mentioned statistical unit.

Signature

ANNEX C

Sample application to the Director of the Statistical Service for the provision of confidential data for research/scientific purposes and form for the recommendation of the Confidentiality Committee regarding the application.



Director
Statistical Service

APPLICATION FOR THE RELEASE OF DATA FOR RESEARCH PURPOSES

(name of applicant/institution).....which is represented by request(s) permission from the Director of the Statistical Service to gain access to confidential statistical data to be used for a scientific/research project, in accordance with the provisions of the Statistics Law, No. 15 (I) of 2000, section 13, subsection (2).

The following information is submitted in support of this application:

1. Description of the project for which the data are requested, its purpose and means of funding.
2. Description of the data requested and justification for the need of using confidential data in order to reach the objective of the research project.
3. Name(s) of the person(s) who will have access to the data.
4. Actions to be taken during the processing and storage of the data in order to ensure statistical confidentiality.
5. Description of the expected output to be published and the means of dissemination.

I hereby certify that the information provided in support of my application is correct and that all researchers involved in the project are in no way implicated in any lawful dispute with the statistical units for which confidential data are requested.

I also declare that after the completion of the project, for which the data are being requested, I will not make the data available to third parties, I will not use the data further for any purposes other than those stated in the application and I will ensure their destruction/erasure from any means of storage.

Date.....

On behalf of

Applicant's signature



**Access to confidential statistical data
Recommendation of the Confidentiality Committee**

Serial number of application:

Legal name of applicant:

Represented by:

Name and surname:

Institution:

Function:

Telephone number:

E-mail address:

Subject:

RECOMMENDATION TO THE DIRECTOR OF THE STATISTICAL SERVICE

- The application is accepted
- The application is accepted under the following conditions:
.....
- The application is **not** accepted for the following reasons:
.....

Date:

Committee signatures:

Chair

Member 1

Member 2

Member 3

DECISION OF THE DIRECTOR OF THE STATISTICAL SERVICE

- The recommendation of the Confidentiality Committee is accepted.
- The recommendation of the Confidentiality Committee is accepted under the following conditions:

- The recommendation of the Confidentiality Committee is **not** accepted for the following reasons:

Date:

Director's signature:
