

ESS Peer Reviews Light Self-Assessment Questionnaire on the implementation of the European Statistics Code of Practice

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Identification	
0a. Please indicate to which Institution the replies to this questionnaire belong?	
National Revenue Agency (Headquarters) Intrastat Directorate	
0b. Please indicate your country.	Bulgaria

Institutional Environment	
<p>Principle 1 - Professional Independence</p> <p>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.</p> <p>Indicator 1.1: The independence of the National Statistical Institutes and Eurostat from political and other external interference in developing, producing and disseminating statistics is specified in law and assured for other statistical authorities.</p> <p>Indicator 1.2: The heads of the National Statistical Institutes and of Eurostat and, where appropriate, the heads of other statistical authorities have sufficiently high hierarchical standing to ensure senior level access to policy authorities and administrative public bodies. They are of the highest professional caliber.</p> <p>Indicator 1.3: The heads of the National Statistical Institutes and, where appropriate, the heads of other statistical authorities have responsibility for ensuring that statistics are developed, produced and disseminated in an independent manner.</p> <p>Indicator 1.4: The heads of the National Statistical Institutes and, where appropriate, the heads of other statistical authorities have the sole responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releases.</p> <p>Indicator 1.5: The statistical work programmes are published and periodic reports describe progress made.</p> <p>Indicator 1.6: Statistical releases are clearly distinguished and issued separately from political/policy statements.</p> <p>Indicator 1.7: The National Statistical Institute and, where appropriate, other statistical authorities, comment publicly on statistical issues, including criticisms and misuses of statistics as far as considered suitable.</p> <p>Indicator 1.8: The appointment of the heads of the National Statistical Institutes and, where appropriate, of other statistical authorities, is based on professional competence only. The reasons on the basis of which the incumbency can be terminated are specified in the legal framework. These cannot include reasons compromising professional or scientific independence.</p> <p>Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:</p> <ul style="list-style-type: none">the head of the statistical department:<ul style="list-style-type: none">The head of the statistical entity (i.e. department, unit, structure, office,...) has the sole responsibility for deciding on statistical methods, standards and procedures, and on the content and timing of statistical releasesNomination and dismissal procedure, and duration of his/her mandateDescription of his/her responsibilities, indicating to which extend he/she can ensure that statistics are developed, produced and disseminated in an independent mannerNature of reporting arrangements to, or the oversight by, the head of the NSIAdministrative levelthe statistical releases<ul style="list-style-type: none">are they regularly used?are they clearly distinguished and issued separately from political/policy statements? <p>National Revenue Agency , "Intrastat directorate"- main responsibility according to the Law for Statistics on Intra-community Trade in Goods: 1. Builds and operates the Intrastat system for data collection; 2. Monitors the coverage of the liable persons and by means of primary and secondary validation controls the credibility of data provided by PSIs via the Intrastat system; 3. Sends to the National Statistical Institute the data collected via the Intrastat system; 4. Informs the Intrastat operators about their obligations in connection with the Intrastat system; 5. Controls the compliance of the Intrastat operators in connection to quality of PSI data. 6. Uses the available data for intracommunity supplies and acquisitions of goods, collected or received under the Value Added Tax Act and the European system VIES, as additional data sources for determination of the liabilities of the Intrastat operators and control of the credibility of data provided via the Intrastat system; 7. Collects through the Intrastat System and provides to NSI monthly data for Trading of goods between EU Member states; Provides to NSI monthly information for changes of VAT obliged traders from the VAT Register and information from VAT Declarations for Intra-Community deliveries and acquisitions of goods; The Intrastat Directorate, being an administrative unit within the NAtional Revenue Agency, obeys the regulations of three laws - the Law on Statistics of Intra-community Trade in Goods, the Law on Public Servants and the Law on the National Revenuey Agency. The Director of the unit proposes methods and procedures for practical implementation of the legal regulations, which are authorised by the top management - the executive or sector deputy-executive director. All the responsibility together with relevant rights for operational management of the INtrastat data collection processes are delegated by th etop management of NRA to the director of the unit.</p>	

Principle 2 - Mandate for Data Collection

Statistical authorities 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.

Indicator 2.1: The mandate of the statistical authorities to collect information for the development, production and dissemination of European Statistics is specified in law.

Indicator 2.2: The statistical authorities are allowed by law to use administrative data for statistical purposes.

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

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular:

- of the legal basis or agreement for collecting/compiling data and for producing European Statistics and
- whether it is publicly available

In addition to the EU Regulations in this area (Regulation (EEC) No.638/2004 and Regulation (EC) No.1982/2004), the Bulgarian legal frameworm for the Intrastat data collection performed by the Intrastat Directorate of NRA is formed by: • Law on Statistics of Intra-community Trade of in Goods (In force from 01.09.2006) and repealed by new Law on Statistics of Intra-community Trade of in Goods, published in State Gazette issue 40 from 29.05.2012 and in force from 01.07.2012; • Ordinance of the Minister of finance No H-4/21.12.2007 for implementation of the Intrastat System, Ammendment published in State Gazette 22.12.2009 and in force from 01.01.2010, Amendment published in State Gazette issue 28 from 19.03.2013. • Ordinance of the Council of Ministeres for the Different or Specific Rules, which shall be applied for specific goods and movements of goods, in force from 01.09.2006, ammendment Published in State Gazette, issue 76 from 15.09.20106, Amendment published in State Gazette issue 97 from 10 December 2010; • Instruction for the cooperation between NSI and National Revenue Agency from 14.02.2011; • Agreements with other governmentat institutions and organizations for dissemination of intra-community data; NRA does not create European statistics and does not disseminate publicly or to private bodies aggregated Intrastat data..

Principle 3 - Adequacy of Resources

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

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

Indicator 3.2: The scope, detail and cost of statistics are commensurate with needs.

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

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

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:

- whether the staff, financial and computing resources are adequate in magnitude and in quality to meet the statistical needs
- whether there are procedures to follow when there are statistical activities which can be discontinued or curtailed in order to free up resources

The human, financial and IT resources with which the “Intrastat” Directorate disposes are quite insufficient to meet the current needs of the unit for execution of its regular tasks and obligations. The directorate is seriously understaffed - the number of employees dropping down to 60% of the minimum required staff as a result of recent administrative reorganisations, though a change in positive direction is expected after some time. For budgetary restrictions the employees of the unit are able to participate only in international professional events in case they are sponsored directly or by reimboursment of the costs through some EU program (resp. of DG Eurostat). The IT resources (computers, servers, network, etc.) are at comparatively good and satisfactory level. But again due to budgetary constraints the unit is sot able to benefit from licenses for some widely used software packages for statistical and economic analyses which would have been very useful for handling and analysing collected data.

Principle 4 - Commitment to Quality

Statistical authorities are committed to quality. They systematically and regularly identify strengths and weaknesses to continuously improve process and product quality.

Indicator 4.1: Quality policy is defined and made available to the public. An organizational structure and tools are in place to deal with quality management.

Indicator 4.2: Procedures are in place to plan and monitor the quality of the statistical production process.

Indicator 4.3: Product quality is regularly monitored, assessed with regard to possible trade-offs, and reported according to the quality criteria for European Statistics.

Indicator 4.4: There is a regular and thorough review of the key statistical outputs using also external experts where appropriate.

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:

- your Quality Commitment
- the procedures to assure the quality of the statistical processes and outputs
- the methods of monitoring the quality with respect to the quality criteria for European Statistics

Intrastat Directorate employees perform with high professionalism and despite the scarce human resource provide the required quality of the data, collected from PSIs and further passed on to the Bulgarian NSI. Quality of collected data is assessed and guaranteed through a series of specific statistical and other methods, including comparisons with data received from other administrative sources available at NRA -VAT/VIES, in compliance with European requirements and standards in NRA.

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 are absolutely guaranteed.

Indicator 5.1: Statistical confidentiality is guaranteed in law.

Indicator 5.2: Staff sign legal confidentiality commitments on appointment.

Indicator 5.3: Penalties are prescribed for any willful breaches of statistical confidentiality.

Indicator 5.4: Guidelines and instructions are provided to staff on the protection of statistical confidentiality in the production and dissemination processes. The confidentiality policy is made known to the public.

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

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

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:

- the legal basis that requires to fully respect Statistical confidentiality
- the protocols applied
- the guidelines and instructions provided to the staff and the confidentiality commitments signed by the staff
- the physical, technological and organizational provisions to protect security and integrity of databases

NRA is obliged to ensure the confidentiality of the individual and personal data and prevent their misuse according to the Law on Statistics and Law on Intra-community Trade in Goods. The competent authorities undertake the necessary organizational and technical measures for the fulfilment of these obligations. Persons, having access to the individual data, sign a declaration that they shall keep it secret and shall not use it for other purposes except for direct fulfilment of their official obligations. The Intrastat Information system has a special internal module for control of access to, and usage of Intrastat data. The system itself is protected to the high professional level of security protection for all NRA information systems.

Principle 6 - Impartiality and Objectivity

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

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

Indicator 6.2: Choices of sources and statistical methods as well as decisions about the dissemination of statistics are informed by statistical considerations.

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

Indicator 6.4: Information on the methods and procedures used is publicly available.

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

Indicator 6.6: Advance notice is given on major revisions or changes in methodologies

Indicator 6.7: All users have equal access to statistical releases at the same time. Any privileged pre-release access to any outside user is limited, monitored and publicised. In the event that leaks occur, pre-release arrangements are revised so as to ensure impartiality.

Indicator 6.8: Statistical releases and statements made in press conferences are objective and non-partisan.

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:

- the equal access to all users – both within the national statistical system and externally -- to statistical releases at the same time
- pre-announced statistical releases calendars
- any privilege access to users - both within the national statistical system and externally -- and whether it is limited, controlled and publicized.
- the error treatment policy and revision strategies

• All information about the national methodology for Intrastat data collection is publicly available on the web-site of the National Revenue Agency. • All the rules and statistical methods used are agreed with National Statistical Institute.

Strengths and weaknesses:

Please state below the main areas of *strength* with regard to the **institutional environment** of your organisation.

• Use of other available data sources - VAT,VIES data for the traders for checking the quality of Intrastat data. • Fully implemented electronic collection of Intrastat declarations and services to Intrastat operators as well as highly developed and sophisticated integrated information system

Please state below the main areas of *weakness* with regard to the **institutional environment** of your organisation.

Insufficient number of staff of the Intrastat Directorate.

Good practices

Please state below the *good practices* with regard to the **institutional environment** that you can enumerate within your organization.

Stable and well regulated cooperation with the relevant colleagues from NSI within an overall combined statistical production process.

Follow up:

On the basis of the above mentioned weaknesses please list below actions you would like to take which are suited to improve the situation concerning the **institutional environment** of your organisation.

Actions and time frame

Increase of the number of employees of the Intrastat Directorate to the required minimum.

Statistical Processes

Principle 7 - Sound methodology

Sound methodology underpins quality statistics. This requires adequate tools, procedures and expertise.

Indicator 7.1: The overall methodological framework of the statistical authority follows European and other international standards, guidelines, and good practices.

Indicator 7.2: Procedures are in place to ensure that standard concepts, definitions and classifications are consistently applied throughout the statistical authority.

Indicator 7.3: The business register and the frame for population surveys are regularly evaluated and adjusted if necessary in order to ensure high quality.

Indicator 7.4: Detailed concordance exists between national classifications systems and the corresponding European systems.

Indicator 7.5: Graduates in the relevant academic disciplines are recruited.

Indicator 7.6: Statistical authorities implement a policy of continuous vocational training for their staff

Indicator 7.7: Co-operation with the scientific community is organized to improve methodology, the effectiveness of the methods implemented and to promote better tools, when feasible.

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:

- the application of standard concepts, definitions and classifications and whether they are in concordance with the corresponding European standards (also related to principle 14)the cooperation with the scientific community
- the recruitment policy in order to guarantee that experts of relevant academic disciplines are hired

• Sound methodology for implementation of the Intrastat system is developed and applied on the basis of specialized Eurostat guidelines, national guidelines for Intrastat operators and internal procedures for NRA staff, involved in the implementation of the Intrastat system and exchange of best practice with other EU MSs through international projects. REcruitment of staff for the Intrastat Directorate is always done by competitive procedures on the basis of specific educational and professional requirements.

Principle 8 - Appropriate statistical procedures

Appropriate statistical procedures, implemented from data collection to data validation, must underpin quality statistics.

Indicator 8.1: When European Statistics are based on administrative data, the definitions and concepts used for the administrative purpose are a good approximation to those required for statistical purposes.

Indicator 8.2: In case of statistical surveys, questionnaires are systematically tested prior to the data collection.

Indicator 8.3: Survey designs, sample selections, and estimation methods are well based and regularly reviewed and revised as required.

Indicator 8.4: Data collection, data entry, and coding are routinely monitored and revised as required

Indicator 8.5: Appropriate editing and imputation methods are used and regularly reviewed, revised or updated as required.

Indicator 8.6: Revisions follow standard, well-established and transparent procedures

Indicator 8.7: Statistical authorities are involved in the design of administrative data in order to make administrative data more suitable for statistical purposes.

Indicator 8.8: Agreements are made with owners of administrative data which set out their shared commitment to the use of these data for statistical purposes.

Indicator 8.9: Statistical authorities co-operate with owners of administrative data in assuring data quality.

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:

In case of statistics based on **survey data**:

- what methods are used for the following issues, if applicable, and how they are revised and updated
 - Data collection
 - Survey design
 - Samples selection
 - Secondary data use
 - Data entry
 - Data coding
 - Questionnaire testing
 - Data processing
 - Editing
 - Imputation
 - Estimation

In case of statistics based on **administrative data**:

- the involvement of the statistical department in the design of administrative data in order to make administrative data more suitable for statistical purposes; to which extent the definitions and concepts used for administrative purposes are a good approximation of those required for statistical purposes and how this is shared/organised with the NSI

The Intrastst Directorate of NRA is performing the raw data collection and processing of Intrastat data. The design of the Intrastat declarations was initially performed in 2006 making use of the knowledge about best EU countries experience in this area. As a part of the overall chain for preparation of Intra-community statistics on trading of goods, Intrastat Directorate of NRA complies with the generally applied statistical procedures for this activity.

Principle 9 - Non excessive burden on respondents

The reporting burden is proportionate to the needs of the users and is not excessive for respondents. The statistical authorities monitor the response burden and sets targets for its reduction over time.

Indicator 9.1: The range and detail of European Statistics demands is limited to what is absolutely necessary

Indicator 9.2: The reporting burden is spread as widely as possible over survey populations.

Indicator 9.3: The information sought from businesses is, as far as possible, readily available from their accounts and electronic means are used where possible to facilitate its return.

Indicator 9.4: Administrative sources are used whenever possible to avoid duplicating requests for information.

Indicator 9.5: Data sharing within statistical authorities is generalised in order to avoid multiplication of surveys.

Indicator 9.6: Statistical authorities promote measures that enable the linking of data sources in order to reduce reporting burden.

Taking into account the Indicators of this Principle, please give details of the activities, methods and tools put in place to comply with this principle.

In particular if you depend from outside respondents for providing you with raw data elaborate on:

- the use of data already available from other sources to avoid duplicating request for information
- (when information is sought from business) whether the information is readily available from their accounts and whether electronics means are used
- the data sharing with other authorities to avoid multiplication of surveys

• The current legal basis for the implementation of the Intrastat system in NRA recognizes and applies all options for reducing the burden on respondents foreseen in European legislation. • The range and the details of the collected data are limited to what is absolutely necessary. Internally within the institution there is very good capability of reusing administrative data, esp. data for VAT-operations.

Principle 10 - Cost Effectiveness

Resources are used effectively.

Indicator 10.1: Internal and independent external measures monitor the statistical authority's use of resources.

Indicator 10.2: The productivity potential of information and communications technology is being optimised for data collection, processing and dissemination.

Indicator 10.3: Proactive efforts are being made to improve the statistical potential of administrative data and to limit recourse to direct surveys

Indicator 10.4: Statistical authorities promote and implement standardized solutions that increase effectiveness and efficiency.

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:

- the use of information and communications technologies
- the use of data already available to limit the recourse to direct surveys
- the monitoring and reporting of resources used for statistical operations

• Current national legislation for implementation of the Intrastat system implies the utilization of the most cost effective method off electronical collection of declarations and other documents or data subject to submission, by Intrastat operators - in electronic form signed with qualified electronic signature through the web site of NRA or in exceptional cases at local offices at NRA. NRA provides to traders off-line and on-line software free of charge for preparation and submission of Intrastat declarations.

Strengths and weaknesses:

Please state below the main areas of *strength* with regard to the **statistical processes** of your organisation.

Very well organized data collection and data validation processes from legal, methodological, logistical and IT point of view.

Please state below the main areas of *weakness* with regard to the **statistical processes** of your organisation.

None

Good Practices

Please state below the *good practices* with regard to the **statistical processes** that you can enumerate within your organization.

Constant contacts and trainings to Intrastat operator or their third parties.

Follow up:

On the basis of the above mentioned weaknesses please list below actions you would like to take which are suited to improve the situation concerning the **statistical processes** of your organisation.

Actions and time frame

None

Statistical Output

Principle 11 - Relevance

European Statistics meet the needs of users.

Indicator 11.1: Processes are in place to consult users, monitor the relevance and utility of existing statistics in meeting their needs, and consider their emerging needs and priorities.

Indicator 11.2: Priority needs are being met and reflected in the work programme.

Indicator 11.3: User satisfaction is monitored on a regular basis and is systematically followed up.

Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular

of: <ul style="list-style-type: none">• how users are consulted and their degree of satisfaction is monitored• how priorities and emerging needs are set
• Not applicable for NRA.
Principle 12 - Accuracy and Reliability European Statistics accurately and reliably portray reality. Indicator 12.1: Source data, intermediate results and statistical outputs are assessed and validated Indicator 12.2: Sampling errors and non-sampling errors are measured and systematically documented according to the European standards. Indicator 12.3: Revisions are regularly analysed in order to improve statistical processes. Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of: <ul style="list-style-type: none">• how source data, intermediate results and statistical outputs are validated• (if applicable) the calculation of sampling and non-sampling errors• (if applicable) the provision of quantitative information about the accuracy of estimates compiled from administrative sources• (if applicable) information about the completeness of administrative registers, and any duplication• the revision policy and its procedures
• Intrastat Directorate of NRA has developed and applies a series of specialized methods and comparisons with data from other administrative data sources at NRA- VAT and VIES systems in order to guarantee the accuracy and reliability of collected Intrastat data.

Principle 13 - Timeliness and Punctuality European Statistics are released in a timely and punctual manner. Indicator 13.1: Timeliness meets European and other international release standards. Indicator 13.2: A standard daily time for the release of European Statistics is made public. Indicator 13.3: The periodicity of statistics takes into account user requirements as much as possible. Indicator 13.4: Divergence from the dissemination time schedule is publicized in advance, explained and a new release date set. Indicator 13.5: Preliminary results of acceptable aggregate accuracy can be released when considered useful. Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of: <ul style="list-style-type: none">• The dissemination policy addressing the following issuesInteraction with users on statistical products and its frequency<ul style="list-style-type: none">◦ Release dates (pre-announced calendar, deviations and justifications)◦ Revision policy◦ Dissemination of preliminary results
The Intrastat Directorate of NRA only delivers collected data to the NSI according to pre-determined deadlines which have been always complied with.

Principle 14 - Coherence and Comparability European Statistics are consistent internally, over time and comparable between regions and countries; it is possible to combine and make joint use of related data from different sources. Indicator 14.1: Statistics are internally coherent and consistent (i.e. arithmetic and accounting identities observed). Indicator 14.2: Statistics are comparable over a reasonable period of time. Indicator 14.3: Statistics are compiled on the basis of common standards with respect to scope, definitions, units and classifications in the different surveys and sources. Indicator 14.4: Statistics from different sources and of different periodicity are compared and reconciled. Indicator 14.5: Cross-national comparability of the data is ensured within the European Statistical System through periodical exchanges between the European Statistical System and other statistical systems. Methodological studies are carried out in close co-operation between the Member States and Eurostat. Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular: <ul style="list-style-type: none">• dissemination of comparable series over a reasonable period of time• (if applicable) on whether statistics from different sources and of different periodicity are compared and reconciled
Not applicable for NRA.

Principle 15 - Accessibility and Clarity European Statistics are presented in a clear and understandable form, released in a suitable and convenient manner, available and accessible on an impartial basis with supporting metadata and guidance. Indicator 15.1: Statistics and the corresponding metadata are presented, and archived, in a form that facilitates proper interpretation and meaningful

<p>comparisons.</p> <p>Indicator 15.2: Dissemination services use modern information and communication technology and, if appropriate, traditional hard copy.</p> <p>Indicator 15.3: Custom-designed analyses are provided when feasible and the public is informed.</p> <p>Indicator 15.4: Access to microdata is allowed for research purposes and is subject to specific rules or protocols.</p> <p>Indicator 15.5: Metadata are documented according to standardized metadata systems.</p> <p>Indicator 15.6: Users are kept informed about the methodology of statistical processes including the use of administrative data.</p> <p>Indicator 15.7: Users are kept informed about the quality of statistical outputs with respect to the quality criteria for European Statistics.</p> <p>Taking into account the Indicators of this Principle, please give details of the activities and procedures put in place to comply with this principle. In particular of:</p> <ul style="list-style-type: none">• how data and metadata are disseminated• how users are kept informed about the methodology of the statistical processes and the quality of their outputs• the type of dissemination service available to users• custom designed analysis and products for satisfying user request• accessibility of micro data
Not applicable for NRA.

<p>Strengths and weaknesses:</p> <p>Please state below the main areas of <i>strength</i> with regard to the statistical output of your organisation.</p>
Timeliness and quality of the delivered data to NSI.

<p>Please state below the main areas of <i>weakness</i> with regard to the statistical output of your organisation.</p>
None

<p>Good Practices</p> <p>Please state below the <i>good practices</i> with regard to the statistical output that you can enumerate within your organization.</p>
None

<p>Follow up:</p> <p>On the basis of the above mentioned weaknesses please list below actions you would like to take which are suited to improve the situation concerning the statistical output of your organisation.</p> <p><u>Actions and time frame</u></p>
None.