

16 September 2009

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Dear Paul

National Quality Assurance Framework

Thank you for your letter of 3 September 2009, requesting comments on the draft discussion paper for the 41st session of the Statistical Commission 2010, prepared by Statistics Canada.

Our response has been prepared in relation to the content discussed in the draft paper. We have assumed that the discussion questions noted in paragraph 42 are for discussion on release of the final paper and have not as yet provided comment in response to these. Please advise if you would like an additional response provided.

I – Introduction: Background and Motivation

The information in the motivation section is particularly relevant and valuable for setting the context and focus of the framework. Noting the three distinct drivers and their relationships is important to guide the implementation (as often the 'relevance' may create the need, the 'efficiency' will determine how the need is met, and the 'product quality' will determine if the need is met).

II – Current Quality Concepts, Frameworks and Tools

In terms of setting the context, it is also extremely valuable to see the number of relevant frameworks and tools available and some of the history of their adoption or implementation. This highlights how many different ways quality management can be approached within NSOs and builds a strong case for the development of a generic framework to consolidate the others.

III – Benefits, Content and Structure of a Generic NQAF

Benefits:

There is an additional benefit around sharing experiences and approaches across NSOs (this is noted in paragraph 39, but not among the benefits). Currently reviewing practices of others requires an understanding of their frameworks and a restructuring in your own organisational framework. Having a generic 'umbrella' framework has the potential to contribute to sharing and improving best practice both nationally and internationally.

Scope:

It is good to see the scope restricted to the core statistical functions, which arguably have the greatest need for NSO-specific guidance. However, a risk is that rather than the framework filling a current gap, it could become an additional framework in an environment where several exist already. It may be valuable to do the mapping to other prominent frameworks to provide guidance, rather than leave it for users to map.

Development:

The idea of a 'minimal' template seems the most practical and realistic way forward. A common template will highlight some useful ideas around standard measures; however as each country will need to apply the template in their own situation, it will be important not to become too restrictive with the guidance provided.

Figure 2: General National Quality Assurance Framework (NQAF)

This appears a good, comprehensive framework. Beginning the template with the context of drivers for quality management will provide a valuable source of comparison to approaches taken by NSOs. It also has the potential of providing good historical guidance as NSOs adapt their approaches based on judgements of their success or usefulness.

In "3 – Quality Assurance Procedures", there are currently potential areas for overlap which will either lead to duplication or large amounts of inconsistent use. (For example, standards are noted in "Managing coherence and comparability" and "Managing statistical infrastructure". Arguably standards could also be interpreted as part of "Managing metadata", "Managing interpretability/clarity", "Managing accessibility", and "Managing accuracy".) It would be good to resolve these either through the guidance material or within the template structure.

A potential addition to "5 – Quality and Performance Management and Improvement" is "Change Management", as this is an important part of managing the impact of improvements.

In the interest of sharing experience, it may also be valuable to include some information about the level and form of organisational resource devoted to quality assurance (or investments in quality improvement). For example, whether organisational structures have a central quality team/role, or if ownership is across several organisational structures, or simply embedded in the production areas. This could also include discussion of any fora for building a quality culture (for example, internal networks or communities of practice).

Annex 1: Quality Assurance Framework at Statistics Canada

It was extremely valuable seeing how Statistics Canada have applied their quality management framework as there are many similarities with our own situation. The guiding principles and the distinction between static and dynamic aspects of quality are extremely valuable in determining the level of effort required over time. As emphasised in the comments above, this framework seems a simple means of sharing some extremely valuable information on approaches to managing quality.

Yours sincerely



Geoff Bascand
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