



INSTITUTO NACIONAL DE ESTATÍSTICA
STATISTICS PORTUGAL

PLAN FOR THE **PREVENTION**

OF **RISKS**

OF **CORRUPTION**

AND **RELATED INFRACTIONS**

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PRESENTATION

In compliance with the Recommendation no. 1/2009 of the Council for the Prevention of Corruption (hereinafter referred to as CPC), published in the 2nd Series of the Official Gazette no. 140, of 22 July 2009, Instituto Nacional de Estatística, I.P. (hereinafter referred to as Statistics Portugal) presented, in January 2010, its Plan for the Prevention of Risks of Corruption and Related Infractions (PPRCIC).

On 25 February 2015, the Plan was revised and updated, monitoring the previous one taking into account the applicable Recommendations of the CPC and of the Organisation for Economic Cooperation and Development (OECD).

After more than 5 years, it has become necessary to carry out some updates to the organic structure, and it has become essential to carry out a more in-depth revision and analysis of situations where there is a potential risk of corruption and related infractions, in relation to the critical activities and/or processes developed by the organic units within the scope of their competencies.

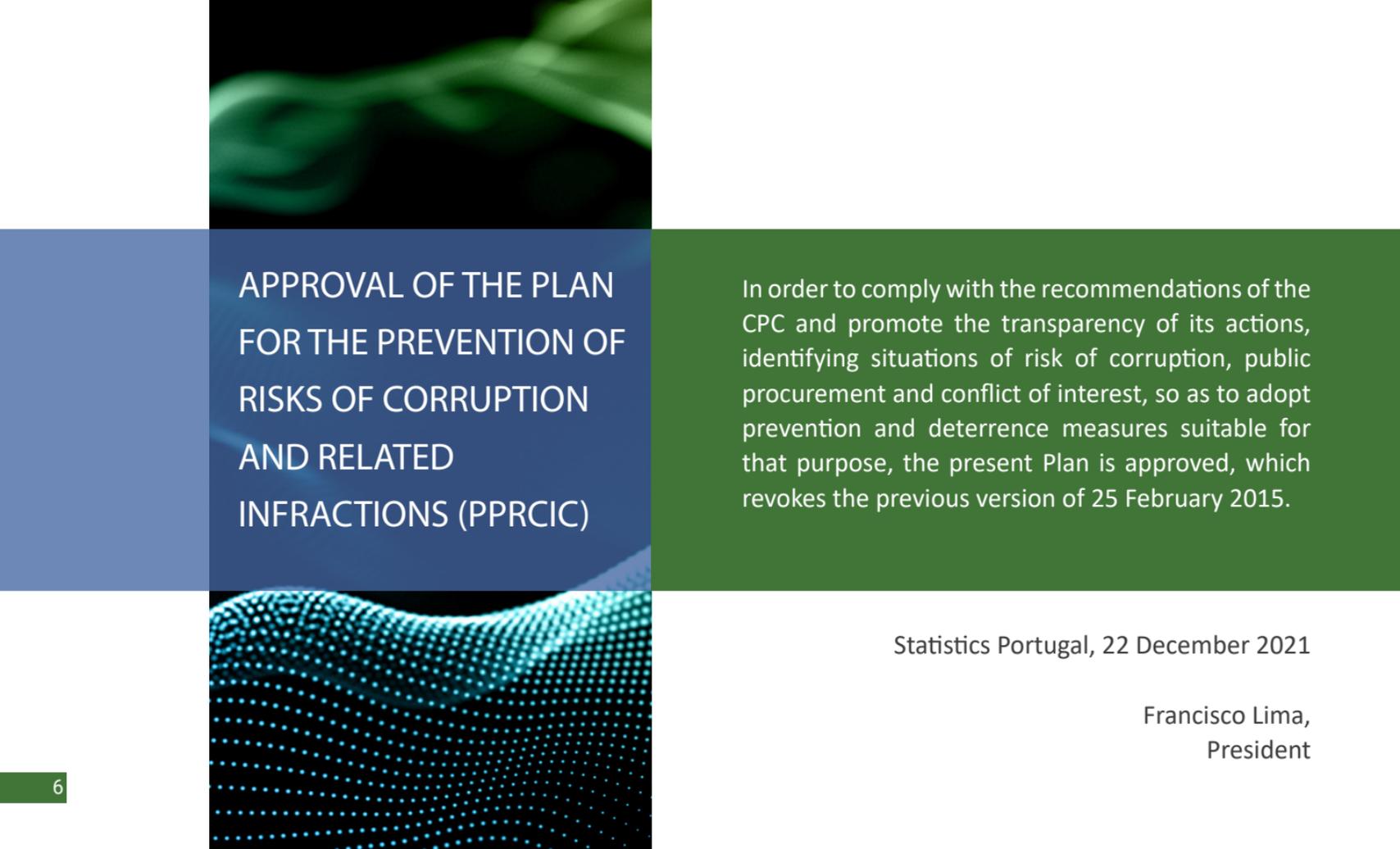
All the Organic Units of the Institute were involved in the revision of this Plan. Of particular importance were the internal control mechanisms already in place, namely the Information Security Management System, as they allow the detection of anomalous situations, and the monitoring of the previous Plan for the Prevention of Risks of Corruption and Related Infractions (PPRCIC), with the analysis of the risks involved and of the measures adopted.

APPLICABLE RECOMMENDATIONS

A number of elements contained in the plan are listed by way of example.

- **CPC Recommendation of 1 July 2009**, on: 1) Identification of each area or department and main activities, as well as the risks of corruption and related infractions; 2) Identification of prevention measures in the identified risk situations; 3) Definition of the managers involved under the direction of the highest governing body;
- **Deliberation of 4 March 2009** on the Assessment of the Management of Risks of Corruption and Related Infractions with the inclusion of a questionnaire on Risk Management Assessment.
- **Guide of September 2009** on the preparation of Plans for the Prevention of Risks of Corruption and Related Infractions.
- **CPC Recommendation of 7 April 2010** on Publicity of the Plan for the Prevention of Risks of Corruption and Related Infractions.

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- **CPC Recommendation of 7 November 2012** on the creation of measures to prevent the occurrence of conflict of interest.
 - **CPC Recommendation of 7 January 2015** on the Prevention of Risks in Public Procurement, published in the Official Gazette, 2nd series, no. 8, of 13 January 2015.
 - **CPC Recommendation of 1 July 2015** on the Plan for the Prevention of Risks of Corruption and Related Infractions.
 - **OECD Recommendation, on: Public Integrity**, adopted by the Council of the Organisation for Economic Cooperation and Development on 26 January 2017 [(C)2017/5].
 - **Note regarding the OECD recommendation on Public Integrity - CPC Recommendation of 2 May 2018.**
 - **Recommendation of 8 January 2020** on Management and Conflict of Interest in the Public Sector.



APPROVAL OF THE PLAN
FOR THE PREVENTION OF
RISKS OF CORRUPTION
AND RELATED
INFRACTIONS (PPRCIC)

In order to comply with the recommendations of the CPC and promote the transparency of its actions, identifying situations of risk of corruption, public procurement and conflict of interest, so as to adopt prevention and deterrence measures suitable for that purpose, the present Plan is approved, which revokes the previous version of 25 February 2015.

Statistics Portugal, 22 December 2021

Francisco Lima,
President

NATIONAL STATISTICAL SYSTEM (SEN)

In accordance with Law no. 22/2008 of 13 May, the National Statistical System Law, the SEN comprises:

- The Higher Statistical Council (CSE), the State body that guides and coordinates the system;
- Statistics Portugal, the central body for the production and dissemination of official statistics, which ensures the technical and scientific supervision and coordination of the SEN;
- The Bank of Portugal as part of its tasks to collect and compile monetary, financial, foreign exchange and balance of payments statistics;
- The Regional Statistical Services of the Autonomous Regions of the Azores and Madeira, which operate as delegations of Statistics Portugal, for national official statistics, and as statistical authorities for regional statistics; and
- Entities with Delegated Powers of Statistics Portugal.

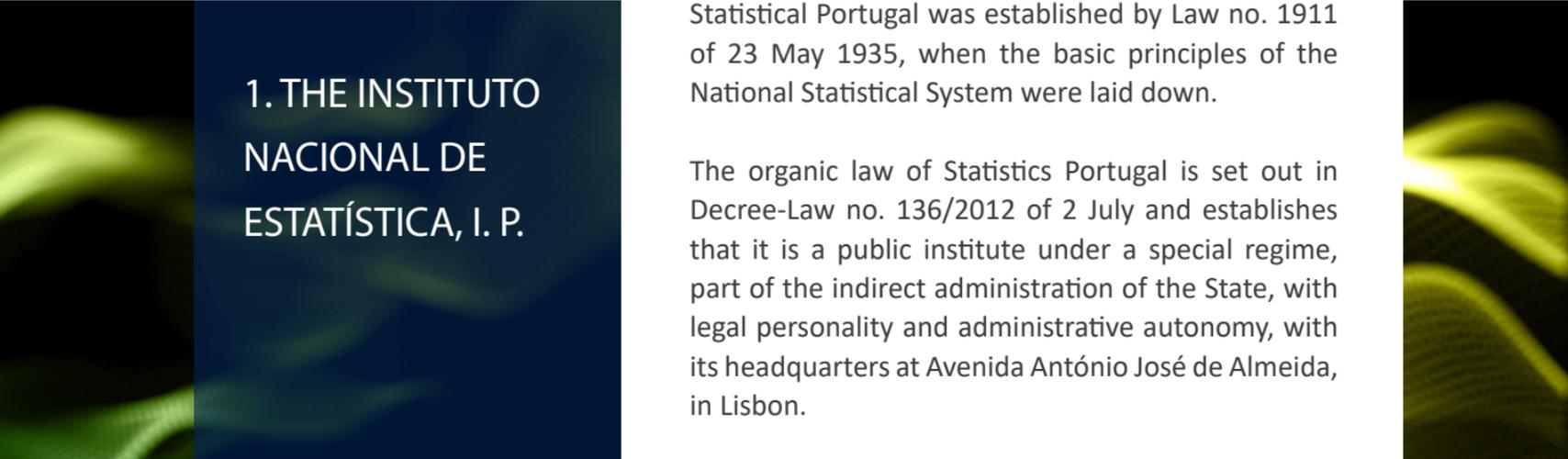
With the exception of the CSE, the referred entities, in their capacity as responsible for the production of official statistics, shall be deemed statistical authorities and may require from all services or bodies, natural and legal persons, any elements required for the production of official statistics and establish the collection of data that, regardless of their relevance to the specific activity of the entities required to provide them, are of statistical importance.



Official statistics are produced with technical independence and considered a public good. They should meet national and international statistical quality standards and satisfy user needs efficiently and without excessive burden on information providers to statistical authorities through the increased use of administrative data.

The individual data collected by statistical authorities shall be of a confidential nature and shall constitute professional secrecy for all employees or other persons who, for whatever reason, become acquainted with them in the course of or in connection with their duties related to official statistical activity. The breach of statistical confidentiality is a very serious administrative offence, entailing criminal liability.

The lack or delay in replying to surveys made by statistical authorities also constitutes a serious administrative offence, subject to the imposition of fines.



1. THE INSTITUTO NACIONAL DE ESTATÍSTICA, I. P.

Statistical Portugal was established by Law no. 1911 of 23 May 1935, when the basic principles of the National Statistical System were laid down.

The organic law of Statistics Portugal is set out in Decree-Law no. 136/2012 of 2 July and establishes that it is a public institute under a special regime, part of the indirect administration of the State, with legal personality and administrative autonomy, with its headquarters at Avenida António José de Almeida, in Lisbon.

1.1 MISSION, VISION AND VALUES

1.1.1. Mission

Under the terms of the strategic framework documents for statistical activity at national and European level, o Statistics Portugal takes it as a mission statement:

- To produce, in an independent and impartial manner, high-quality official statistical information, relevant for society, promoting the coordination, analysis, innovation and dissemination of the national statistical activity, ensuring the integrated storage of data.

In carrying out official statistical activities, Statistics Portugal enjoys independence and may, in its capacity as a national statistical authority, require the provision of information, on a mandatory and free of charge basis, with a guarantee of the protection of statistical confidentiality, under the terms of the National Statistical System law (SEN).



1.1.2. Vision

Statistics Portugal as an independent and credible Statistical Authority, develops methodologically advanced statistical processes, uses technological innovation, data science, integration of multiple sources for statistical purposes, respects the confidentiality of citizens and entities, and provides valuable statistics to society for better knowledge, research and decision-making.

1.1.3. Values

Statistics Portugal, in line with the European Statistics Code of Practice, is characterised by:

- » Professionalism, ethics and respect for confidentiality
- » Technical independence, objectivity and impartiality
- » New skills and human resources enhancement
- » Commitment to quality
- » Creativity, innovation and continuous improvement of processes
- » Respect for data source owners
- » Successful partnerships with external entities
- » Satisfaction of different statistical needs



1.2. MANAGEMENT INSTRUMENTS

Statistics Portugal pursues its mission, supported by the following management instruments:

- » Activity plan;
- » Activity report;
- » Budget;
- » Report and Accounts;
- » Management Account;
- » Social Balance;
- » Staff Maps;
- » QUAR - Assessment and Assessment Framework (within the scope of SIADAP);
- » Policies, procedural and internal control standards.

1.3. ORGANISATION AND OPERATION

Statistics Portugal's Administration Board comprises a President and two members.

The tasks of Statistics Portugal are:

- To produce official statistical information, with the objective of supporting public, private, individual and collective decision-making, as well as scientific research;
- To draw up the Portuguese National Accounts, in coordination with the other competent bodies, ensuring compliance with national obligations within the framework of the European Statistical System, particularly with regard to the Excessive Deficit Procedure;
- To disseminate, in an accessible manner, the statistical information produced;
- To coordinate and perform the technical-scientific and methodological supervision of official statistics produced by entities with delegated powers and by the Regional Statistical Services of the Autonomous Regions;
- To cooperate with the national entities and those of other States, the European Union and international organisations in the area of statistical information.

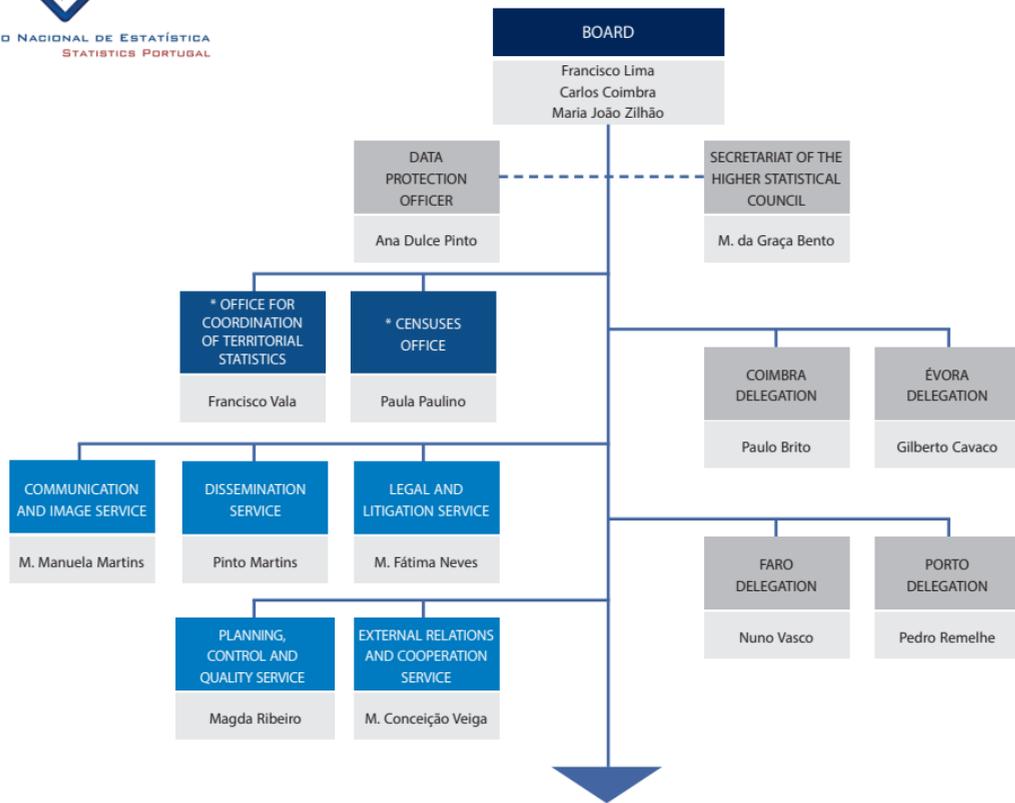


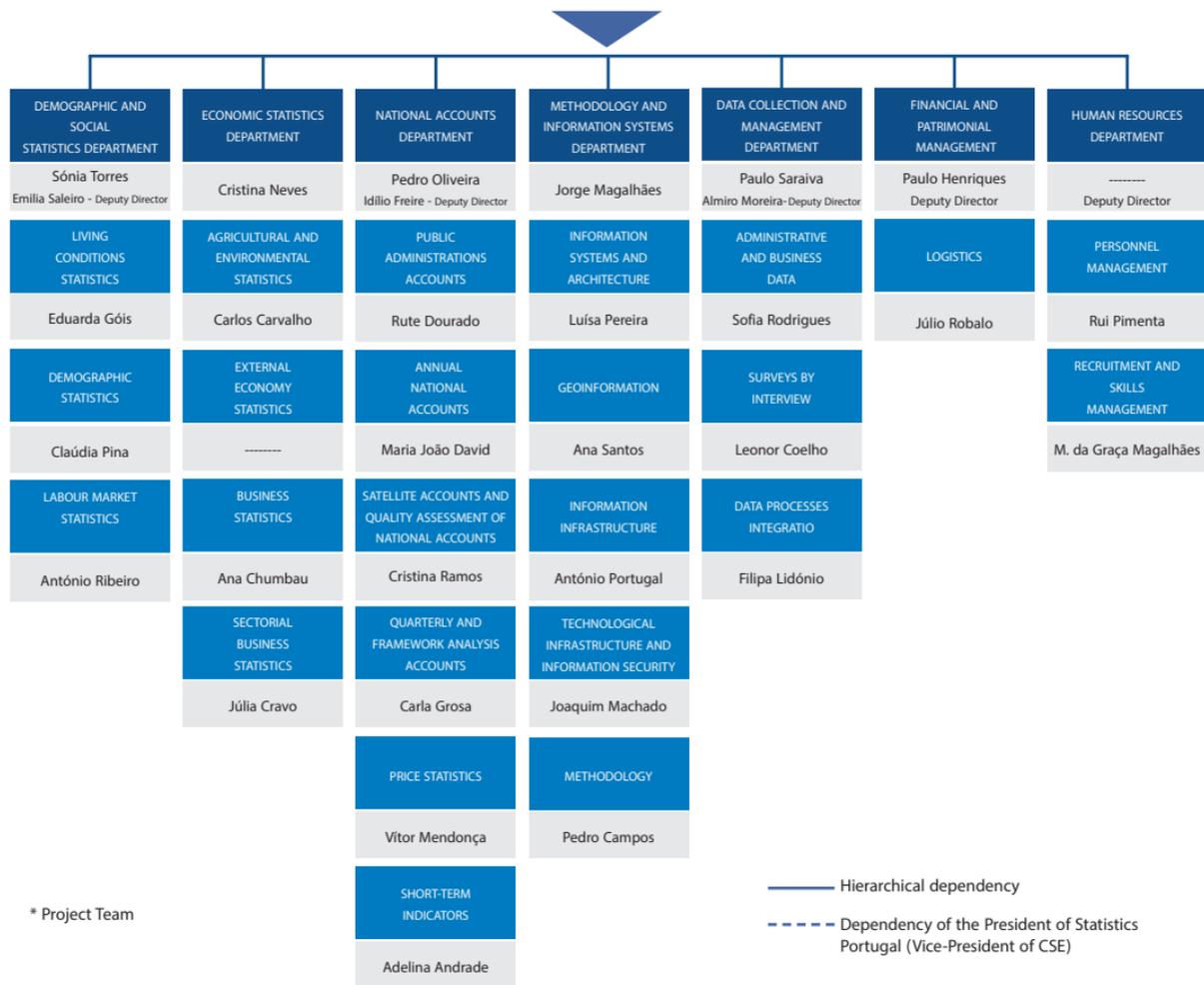
1.4. ORGANISATIONAL CHART

Ordinance no. 423/2012, of 28 December, amended by Ordinance no. 120/2014, of 9 June and by Ordinance no. 68/2019, of 25 February, defines the internal organisation of Statistics Portugal.

The internal organisation of Statistics Portugal is made up of 1st, 2nd and 3rd level units, designated departments, services and nuclei, respectively.

The organisational structure is hierarchical, in accordance with the relationships shown in the following organisation chart, which also identifies the respective managers:





* Project Team

— Hierarchical dependency

- - - - Dependency of the President of Statistics Portugal (Vice-President of CSE)



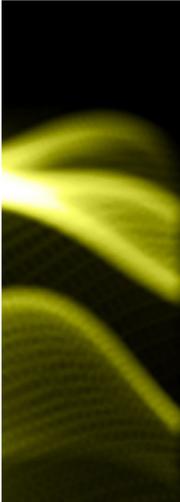
2. STATISTICS PORTUGAL'S PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS

Statistics Portugal's Plan for the Prevention of Risks of Corruption and Related Infractions aims at safeguarding the accuracy of decisions taken in view of the legislation in force, the established procedures and the contractual obligations to which Statistics Portugal is bound.

Following the Recommendations of the Council for the Prevention of Corruption (CPC), it is concluded that "the areas of public procurement" and "conflict of interest" involve "high risks of corruption" which should be prevented through adequate prevention plans". The Financial, Accounting, Logistics and Human Resources areas are also included. The statistical information production area is also analysed, identifying potential risks and presenting the respective prevention measures.



In the presentation of the plan one will find information about the following aspects (in Annex 1):

- Identification of the organic units which activity may involve risks, defining those risks in conceptual terms, which may or may not occur, and which must be addressed;
 - Identification of the main activities of the organic units;
 - Identification of potential risks;
 - Prevention measures aimed at their elimination.
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2.1. CRITERIA FOR THE ASSESSMENT OF THE RISKS OF CORRUPTION AND RELATED

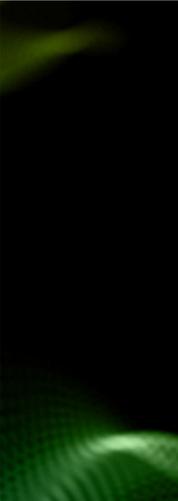
The matrix and criteria for assessing low, moderate or high risk are set out in the table below:

	Low Risk	Moderate Risk	High Risk
Definition	The risk situation does not have the potential to cause financial damage to the State, and the infractions that are likely to be committed do not cause relevant damage to the image and operations of the institution.	The risk situation may lead to financial losses for the State and disturb the normal functioning of the body.	The identified risk situation may result in significant financial losses to the State and a serious breach of the principles associated to the public interest, damaging the credibility of the body and of the State itself.
Probability of Occurrence (PO)	Infrequent situation.	Frequent situation.	Very frequent situation.
Severity (S)	Damage to the optimisation of organisational performance, requiring the rescheduling of activities or projects.	Damage to image and/or the management of operations, requiring the redeployment of resources in time and/or costs.	Damage to the image and reputation of institutional integrity, as well as the performance of its mission.
Reversibility of Effects (RE)	Reversibility of effects.	Reversibility of more serious effects.	Irreversibility of effects.



3. MONITORING OF THE PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS

Considering that the internal control mechanisms in place and the measures adopted are those necessary to minimise and/or eliminate the risks identified, the Plan for the Prevention of Risks of Corruption and Related Infractions is subject to continuous monitoring, with changes to the Plan only taking place when situations that justify it occur.





4. REVISION OF THE PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS

Whenever there are changes in the internal procedures in force and/or in the organic structure, including those responsible for them, the Financial and Asset Management Department shall propose an updated version of the risk plan to the Board and a report on the Management of the Plan for the Prevention of Risks of Corruption and Related Infractions must be drawn up on an annual basis.



5. DISCLOSURE OF THE PLAN FOR THE PREVENTION OF RISKS OF CORRUPTION AND RELATED INFRACTIONS

Under the terms established, this Plan for the Prevention of Risks of Corruption and Related Infractions shall be disclosed as follows:

- To the Council for the Prevention of Corruption;
- To the Government member responsible for Statistics Portugal;
- To Statistics Portugal's employees, through the Intranet;
- To the general public, through publication on Statistics Portugal's portal.



ANNEX 1

Development of areas, activities, risks and preventive measures

The following tables provide information on the following aspects:

- a) Identification of the organic units which activity is likely to involve risks and the main activities;
- b) Identification of the risk, prevention measure and control mechanisms adopted.

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

The risk prevention and internal control measures that were determined according to the relevant areas and activities are presented.

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
FINANCIAL AND PATRIMONIAL MANAGEMENT (DAFP)	<ul style="list-style-type: none"> • Design and prepare the Operating Budget and Investment Projects; • Monitor on a monthly and quarterly basis the main deviations in the implementation of the Organic Units' budgets; • Process and settle all expenses; • Account for, collect and control Own Revenues; • Issue requests for payment of financial grants with EUROSTAT; 	<ul style="list-style-type: none"> • Risk of errors in the Budget projections • Risk of embezzlement • Risk of failures in the application of standards, procedures and regulations of a financial nature • Risk of omission or manipulation of information with the aim of conditioning the financial decision • Risk of deficient management of the processes of acquisition of goods and services 	<ul style="list-style-type: none"> • Intermediate and final information conferences • Monitoring and control of the implementation of measures provided for in the internal control standards • Procedures on planning and budgeting of Statistics Portugal's activities • Detailed procedures with documentary control, recording and organisation of the procedures carried out, with cross-referencing of information • Segregation of functions and different levels of assessment

continued

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
FINANCIAL AND PATRIMONIAL MANAGEMENT (DAFP)	<ul style="list-style-type: none"> • Register all commitments, payments and budget changes in GERFIP; • Prepare the Report and Management Account; • Prepare quarterly and annual reports containing information on budget implementation; • Prepare dossiers on the financial implementation of grants with EUROSTAT; • Carry out the procedures for the acquisition or rental of goods and services; • Draw up contracts for supplies, rental and assistance and maintenance; • Check all invoicing; • Maintain up-to-date asset registers and inventories, including the Motor Vehicle Fleet; • Maintain the buildings of Statistics Portugal, including Delegations 	<ul style="list-style-type: none"> • Risk of information leakage or favouritism in procurement procedures • Deficient preparation of the procedural documents • Risk of conflict of interest 	<ul style="list-style-type: none"> • Control of procedural documents by various levels with circulation of contributions by the various intervening parties • Audits of Eurostat’s payment claims • Standardisation of procedures • Rotation of jury members • Registration on the Electronic Public Procurement platform • of the interventions verified in each procurement procedure • Signature of a statement of absence of conflicts of interest in all procedures

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
<p>HUMAN RESOURCES DEPARTMENT (DRH)</p>	<ul style="list-style-type: none"> • Select and recruit staff and interviewers; • Draw up the Social Balance; • Process salaries and allowances; • Control the attendance register; • Analyse and process the processing of faults; • Draw up staff holiday schedules; • Draw up accidents at work and social benefits processes; • Book, check and process travel, accommodation and daily subsistence allowances; • Monitor the accumulation of functions; • Organise the management of processes associated with SIADAP; • Draw up and assess the Training Plan. 	<ul style="list-style-type: none"> • Risk of breaching the duties of exemption and impartiality in staff selection • Risk of access to employee information and breach of confidentiality • Risk of failure to register staff data information • Risk of failures in the processing of remuneration and other allowances • Risk of conflict of interest • Risk of low implementation of the training programme 	<ul style="list-style-type: none"> • Adoption of procedures and appointment of juries differentiated according to the type of tenders • Rotation of jury members • Processes for identifying HR needs, with decision-makers at various levels • Security measures in individual case files, with restricted access • Segregation of duties and responsibilities of operations with the checking of all changes • Monthly processing and checking of remuneration and other monthly allowances • Requirement of an individually signed statement of non-existence of conflicts • Cross-checking and comparison testing

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
<ul style="list-style-type: none"> • ECONOMIC STATISTICS (DEE) • Demographic and Social Statistics (DES) • National Accounts (DCN) • Data Collection and Management (DRGD) • Census (2021 CENSUSES) • Territorial Statistics (GET) 	<ul style="list-style-type: none"> • Produce and make available official statistics; • Study the feasibility of the statistical operation; • Study the methodology of the statistical operation; • Collect data or adapt administrative data; • Process and analyse the data collected; • Exchange micro-data with other Statistical Authorities; • Securely archive collected and processed data in order to safeguard statistical confidentiality and prevent undue access and destruction; • Develop statistical methods; • Integrate new data sources; • Manage and keep the Metadata system up to date; • Certify official statistical operations. 	<ul style="list-style-type: none"> • Risk of breach of confidentiality • Risk of misuse of basic information of unpublished statistical results • Risk of manipulation of data or basic information of statistical results • Risk of hiding of data of statistical results • Risk of destruction of data or information of statistical results • Risk of destruction or deterioration of the data file • Risk of incorrect and outdated content • Risk of lack of articulation between the various departments/ services 	<ul style="list-style-type: none"> • Classification of information in terms of confidentiality and sharing by users, based on availability, continuity and security requirements • Safeguard procedure and information recovery or reconstruction • Identification, classification and monitoring of the critical components of the technological infrastructure • Security measures at data traffic control and regulation points • Information security and management system policies and procedures • Knowledge sharing with articulation of information

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
Methodology and Information Systems (DMSI)	<ul style="list-style-type: none"> • Feasibility study of the statistical operation; • Methodological study of the statistical operation; • Planning and preparation of the statistical operation; • Processing and analysis of the data collected and production of official statistics; • Secure archival of the collected and processed data in order to safeguard statistical confidentiality and prevent undue access and destruction. 	<ul style="list-style-type: none"> • Risk of breach of confidentiality • Risk of manipulation of data or basic information of statistical results • Risk in the provision of data • Risk of destruction of data or information of statistical results 	<ul style="list-style-type: none"> • Security measures at data traffic control and regulation points • Information security and management system policies and procedures • Confidentiality classification of information • Clarification of data protection methods and procedures • Effective clarification of the ethical obligations for handling statistical confidentiality.

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
<p>LEGAL AFFAIRS SERVICE (JC)</p>	<ul style="list-style-type: none"> • Provide legal support to the BoD and all the Organic Units; • Collaborate in the development of the National Data Infrastructure; • Participate in the monitoring of the implementation of the GDPR in articulation with the DPO; • Prepare, in articulation with the Organic Units involved, all documents of a normative or contractual nature; • Coordinate procedures of the statistical offence process; • Monitor other litigation processes; • Monitor and disseminate legal regulations. 	<ul style="list-style-type: none"> • Risk of non-compliance with litigation deadlines • Risk of breach of confidentiality of information subject to secrecy • Risk of reduction in the quality of information provided for decision-making purposes • Risk of outdated legislation for decision-making • Risk of preparation of drafts without a confidentiality statement in contracts and protocols • Risk of non-compliance with the policies and procedures of the information security and management system 	<ul style="list-style-type: none"> • Registration of statistical offence procedures in a special computer application • Revision and control of deadlines and procedural documents • Electronic register and network archive of incoming and outgoing documentation with control of associated response times and cross-referencing with the registered processes • Legal analysis of documents, contracts and protocols involving different hierarchical levels. • Disclosure of updated legislation/ information applicable to the opinions issued with dissemination to the respective organic units • Verification of the confidentiality statement in all contracts and protocols • Policies and procedures of the information security and management system

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
Dissemination Service (DI)	<ul style="list-style-type: none"> • Participate in defining the dissemination policy; • Collaborate in the definition and design of statistical operations, aimed at meeting user needs; • Ensure the relationship systems with the users of statistical information; • Promote dissemination products and services to users; • Manage the documentation system and archive. 	<ul style="list-style-type: none"> • Risk of inadequate promotion of Statistics Portugal's image • Risk of incorrect and outdated content • Risk of errors and failures in publications • Risk of lack of supporting information • Risk of document deterioration • Risk of providing inadequate information in the attendance and relationship with third parties 	<ul style="list-style-type: none"> • Satisfaction surveys • Preparation and publication of indicators • Dissemination system procedures and revisions • Definition of internal procedures rules • Procedures to guarantee the conservation of documents • Physical and environmental security of documents

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

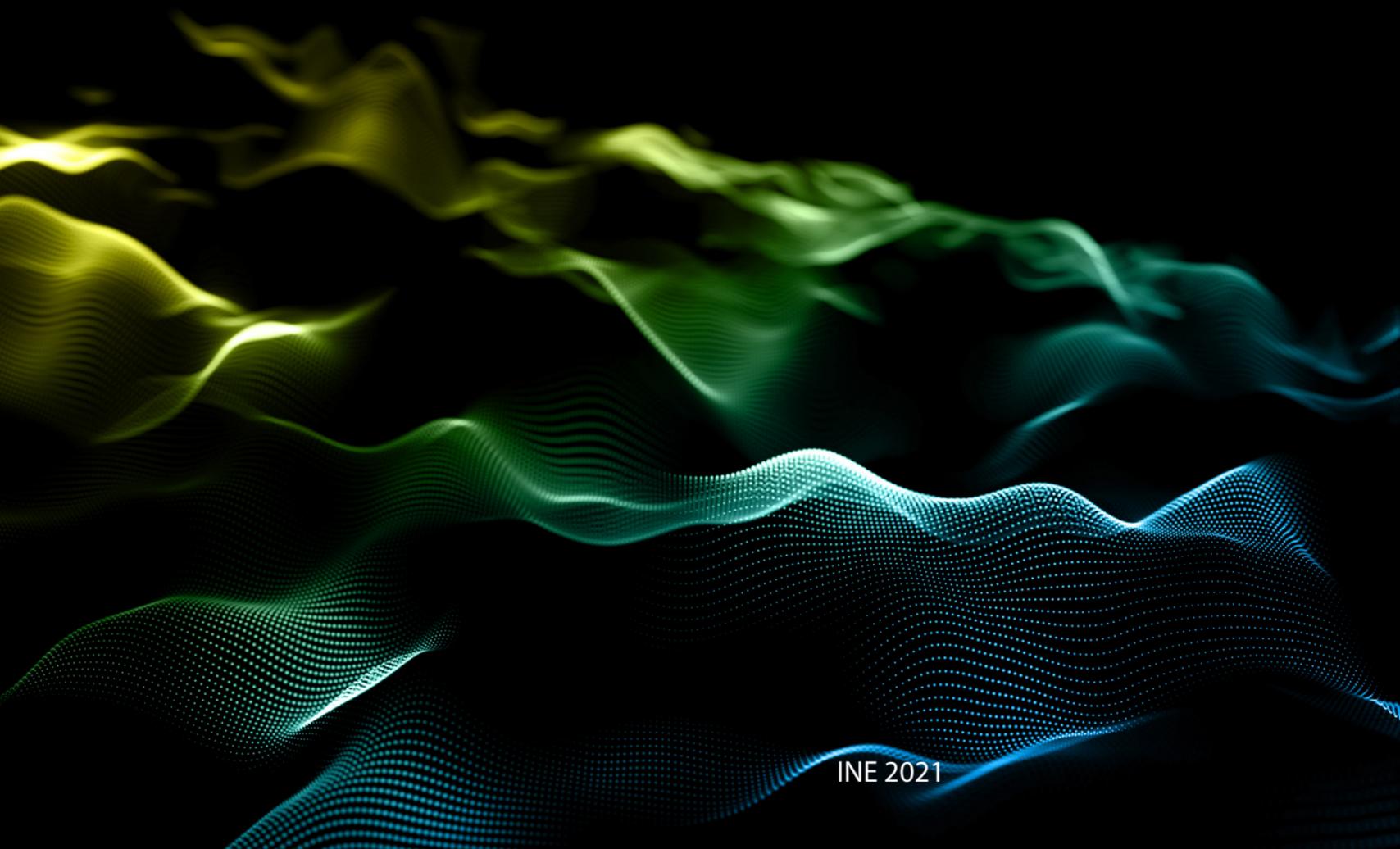
Organic U.	Main Activities	Identification of the Risk	Prevention Measures
<p>Communication and Image Service (CI)</p>	<ul style="list-style-type: none"> • Ensure relations with the Media, namely through dissemination of the activities of Statistics Portugal and the information produced; • Participate in defining the policy for institutional communication and image; • Manage the institutional image, through the creation and dissemination of contents on Statistics Portugal's platforms; • Organise events of Statistics Portugal. 	<ul style="list-style-type: none"> • Risk of inappropriate information or incorrect content • Risk of inadequate dissemination of Statistics Portugal's image and information • Risk of information leakage • Risk of providing inadequate information in the attendance and relationship with third parties 	<ul style="list-style-type: none"> • Definition and validation with various levels of liability • Dissemination system procedures and revisions • Tests with cross-checking of information • Information security system policy and procedures

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
External Relations And Cooperation Service (REC)	<ul style="list-style-type: none"> • Coordinate international relations, particularly within the framework of the European Union; • Support the Organic Units in the preparation and participation in international activities; • Support the DC, in articulation with the Units involved, in the monitoring of services provided to the European Commission; • Streamline, monitor and assess the statistical cooperation activities. 	<ul style="list-style-type: none"> • Risk of inadequate promotion of Statistics Portugal's international image • Risk of providing inadequate information in the relationship with third parties 	<ul style="list-style-type: none"> • Preparation of technical execution and quality reports on missions • Prior validation of international positions • European Statistics Code of Practice • Policies and procedures of the management and security system

ORGANIC UNITS, ACTIVITIES, IDENTIFICATION OF RISKS AND PREVENTION MEASURES

Organic U.	Main Activities	Identification of the Risk	Prevention Measures
<p>Planning, Control and Quality Service (PCQ)</p>	<ul style="list-style-type: none"> • Coordinate the preparation of strategic and operational planning documents; • Monitor and control the implementation of the planned activities; • Coordinate and prepare activity reports and QUAR; • Streamline and manage the Quality System; • Coordinate actions relating to the implementation of the European Statistics Code of Practice; • Conceive and manage, in articulation with the Organic Units involved, the document system to support internal processes; • Promote the assessment of processes and information user satisfaction and monitor the implementation of quality improvement projects; • Coordinate and prepare the process of submitting to the BoD the concepts, collection media and methodological documents of official operations under the responsibility of Statistics Portugal and the EDC. 	<ul style="list-style-type: none"> • Risk of deficiency in the control of the various planning phases • Risk of reduction in the quality of the products produced • Risk of non-compliance with the deadlines for making information available • Risk of failure in the control of quality of procedures • Risk of breach of confidentiality • Risk of providing inadequate information in the attendance and relationship with third parties • Risk of non-achievement of the objectives set out in the Activity Plan 	<ul style="list-style-type: none"> • Supervision and revision of procedures • Tests with cross-checking of information • Suggestions and complaints system • Monitoring of the compliance with the timetables drawn up and justification of deviations • Promotion of a system for consultation of users • Information security system policy and procedures and confidentiality, privacy and data protection policies • Peer Reviews on compliance with the European Statistics Code of Practice



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