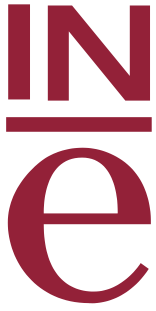


INSTITUTO NACIONAL DE ESTADISTICA



Statistical Confidentiality Policy

June 2026

Preservation of Statistical Confidentiality at the INE. Confidentiality Policy

Instituto Nacional de Estadística [National Institute of Statistics] (INE) bases its work on the trust that citizens and companies place in it through the information they provide, which is necessary for the preparation of the statistics that society and institutions entrust to it.

At the heart of this trust lies the principle of statistical secrecy that governs statistics for state purposes, recognised under Article 4 of Law 12/1989 of 9 May on the Public Statistical Function (LFEP in its Spanish initials) and set out in Chapter 3, thus guaranteeing the secrecy of all confidential data relating to the individual statistical units that are handled during the different phases of statistics production.

To ensure full compliance with its legal obligations and ethical commitments¹ regarding the protection of statistical secrecy, the INE has created the **Committee on Statistical Secrecy (CoSE)**, which is the body responsible for designing the policy and instruments necessary in this matter, as well as handling internal queries and advising the statistical services of the General State Administration. The CoSE serves as a channel for collecting and disseminating good practices and making recommendations on the protection of statistical secrecy and, in general, reports on the main issues concerning the application of statistical secrecy at the INE.

The [European Statistics Code of Practice \(ESCoP\)](#), adopted by the INE and the entire statistical system of the State for all statistics of the National Statistics Plan, includes, under principle number 5 (statistical confidentiality and data protection), different indicators that provide for an evaluation of the assurance of confidentiality.

In this regard, the INE has adopted the following guidelines of action:

1. "Effective procedures are in place for safeguarding confidential information handled at all stages of the statistical process"

- The INE has an information security policy whose objective is to ensure the confidentiality, integrity, authenticity, traceability and availability of information and services. This applies to all INE information systems.
- Specific rules are in place regarding information security in data collection processes and systems.
- Before the dissemination of statistical information (aggregate data and microdata), statistical disclosure control methods are applied to ensure statistical confidentiality, so that, in dissemination systems, the published information is always anonymised.

2. "It is guaranteed that all personnel in the organisation are aware of their obligation to maintain statistical confidentiality and the procedures established for this purpose at any given time"

- Continuing education plans include training and refresher courses on statistical confidentiality and provide a manual on the protection of statistical confidentiality in the dissemination and access to data for scientific purposes, which contains the relevant legal information and techniques and recommendations on its application.
- Consulting from the CoSE on the use of these techniques in specific cases can also be requested. The same applies for the preparation of auxiliary material for specific groups.

- All INE staff who work with confidential information, including interns or students doing university internships, sign an individual declaration safeguarding statistical secrecy. This obligation extends to workers from external companies and institutional research staff.
- 3. "Informants are given information on the protection afforded to the data provided"**
- When statistical services request data from citizens or companies, they provide the data subjects with sufficient information about the protection afforded to them by statistical secrecy, as provided for under the LFEP.
 - The interviewing staff are properly trained on the protection given to interviewees under statistical secrecy and they inform the latter about such guarantees.
 - Confidential data from administrative records is also protected by statistical secrecy.
- 4. "Users of statistics are informed of the restrictions on the information provided due to statistical confidentiality protections"**
- In dissemination systems, data protected by statistical secrecy are specially labelled when the method provides for it.
 - When accessing a released product in which a disruption method has been applied to avoid jeopardising the confidentiality of the information, users are informed to the extent that it does not compromise the irreversibility of the applied procedure.
 - The methodology reports for each statistical operation describe the methods used to protect the confidentiality of the information.
- 5. "The preservation of statistical secrecy is guaranteed in cases of transfer of confidential data, as provided for under the LFEP"**
- The necessary protocols are established to ensure that the conditions provided for under the LFEP or other applicable instruments are met when confidential data is transferred for statistical or scientific uses.
 - All transfers of confidential data are formalised through institutional agreements or contracts, except in the following cases:
 - Transfers to statistical services of the General State Administration for operations included in the National Statistical Plan, in accordance with the provisions of Article 15.1 of the LFEP.
 - The transfer of confidential data to research institutions, studies or analyses that take place under Article 15.3 of the LFEP and that adapt to those authorisation protocols already established.
 - Requests for confidential data that are not formalised through an agreement must always be evaluated in the CoSE and determined by Resolution of the competent Unit.
 - The use of confidential data for research for scientific purposes, as provided for by European and national legislation, is subject to strict access requirements.

6. “Compliance with personal data protection regulations is guaranteed in the exercise of the statistical function”

- In addition to the specific guarantees on the statistical secrecy provided for under the LFEP, the INE guarantees full compliance with current personal data protection regulations in all the processing of data of natural persons that it carries out in the exercise of its functions, fundamentally the provisions of Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD) and under Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, repealing Directive 95/46/EC.
- The INE has a Data Protection Officer and the necessary governance instruments to ensure effective compliance with these obligations.

¹ In addition to the LFEP, the following legal framework must be taken into consideration: data protection regulations (primarily Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD in its Spanish initials)), the regulations on the National Security Framework (Royal Decree 311/2022 of 3 May, which regulates the Spanish National Security Framework), and national and European regulations governing the digital environment and the use of artificial intelligence where applicable, mainly Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024, laying down harmonised rules in the field of artificial intelligence.

Similarly, Article 4 of the LFEP establishes that all statistical production for state purposes shall be implemented, prepared and disseminated in accordance with the principles and requirements regulated in this law, in the Regulation 223/2009 of the European Parliament and of the Council of 11 March 2009, with regard to European Statistics and the quality standards, and the principles set out in the European Statistics Code of Practice.

Therefore, the regulations approved in the EU for the production of European statistics in this area are directly applicable: Regulation (EC) 223/2009 of the European Parliament and of the Council of 11 March 2009 on European Statistics and its implementing regulation, Commission Regulation (EC) 557/2013 of 17 June 2013 on access to confidential data for scientific purposes.