

# A wake-up call: Why we have to strengthen awareness about our mission

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## 1 Background: The potential new data held by private companies has for official statistic

In 2017, The Economist published a story titled: "The world's most valuable resource is no longer oil, but data." Since its publication, the topic has generated a great deal of discussion, and "Data is the new oil" has become a common refrain. The big and important question in a data-driven world is: What will happen to all the data that are created? Who should have access and what can the data be used for? From a National Statistical Office (NSO), and official statistics, based on these data, are a public asset available for all. For decades surveys and administrative registers have been the only kinds of input available for official statistics. Now, there are several examples of statistical agencies which use new sources of data from private companies, and a discussion how new data will change and challenge official statistics. As Ricciato, Wirthmann and Hahn emphasise in their paper "Trusted Smart Statistics: How new data will change official statistics (2020)"<sup>1</sup>: "The power of the label "official" to signify credible, accurate, and trustworthy will come increasingly under strain". This case from Statistics Norway (SSB) highlights that using new data sources requires that statistical agencies have legitimacy and trust in society for their mission, and the importance of enhancing our communication about our social mission and mandate.

## 2 The case: A new Household Budget Survey using private data

In 2019 the new Statistics Act<sup>2</sup> for Norway was launched. This act authorizes SSB to impose a legal obligation to provide any data, public or private, that may be necessary, to develop, produce or disseminate official statistics. The Statistics Act asks us to do a cost-benefit assessment before imposing any obligation to provide data. This assessment requires us to consider the costs for the providers of data, the potential risk for individuals which the data provide information about, to identify the benefits for society and to assess the risks and costs versus the benefits.

In SSB the Household Budget Survey (HBS) had a pressing need for modernisation. We have collected data about household consumption since 1958, by asking the respondents to fill a detailed diary of every household-purchase during a period of 14 days. The burden for the respondent is considerable, and we experienced a falling response rate in the last survey, which was conducted in 2012. However, there is a pressing need for new consumption statistics from a user perspective. The consumption statistics provides a factual basis for assessing and formulating tax policy. The Norwegian Labour and Welfare Administration (NAV) has used the consumption statistics to calculate social benefits, while the Norwegian Directorate of Health uses them to describe developments in the Norwegian diet, among others.

A way forward to deliver improved consumption statistics was found in two new big data sources, data from retail receipts and bank transactions. In Norway we are 5.5 million inhabitants. We have

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<sup>1</sup>[Trusted Smart Statistics: How new data will change official statistics | Data & Policy | Cambridge Core](#)

<sup>2</sup> <https://lovdata.no/lov/2019-06-21-32>

four grocery chains having 98 per cent market share. If we combine the receipt-data from these grocery chains with payment transactions from NETS Norway, the Norwegian part of the European PayTech, SSB will receive data about consumption for all households in the various regions of Norway, including detailed purchases of different commodities. Since this was part of SSBs modernisation project, where we aimed to find the best methods for exploring the data, we wanted continuous streaming of data. SSB started a dialogue with both the grocery chains and Nets Norway, and in 2018 we received data from the grocery chains for a technical test.

In addition to the consumption statistics, we also saw the potential to use these data for dietary statistics, which would be new official statistics. The Norwegian Directorate of Health very much voiced in favour of dietary statistics, hence a coordinating group with members from the grocery chains and the Norwegian Confederation of Business and Industry (NHO), the directorate and SSB discussed potential plans for dietary statistics.

The cost-benefit assessment was published on [ssb.no](https://ssb.no) in May 2022, and the obligation was imposed to the five data owners, the grocery chains and NETS Norway.

What happened next came as a surprise, taking into consideration the thorough preparation and frequent dialogue over the last years. Two of the grocery chains and Nets Norway appealed against the decisions. And a new player entered the field: The Norwegian Data Protection Authority (DPA), which immediately launched an inspection and made a temporary stop to SSB's decision. DPA's argument is that this appears to be a highly invasive processing of personal data concerning a significant portion of Norway's population. In their press release they point to their main concern: "The question is how much the state should actually know about the daily life and habits of individual citizens, to get access to privately held data containing information about Norwegians."<sup>3</sup>

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<sup>3</sup> [Vil føre kontroll med Statistisk Sentralbyrå | Datatilsynet](#)

### 3 The case from a media perspective

Samfunn

# SSB krever å få vite nøyaktig hva nordmenn kjøper i matbutikken

Skrevet av [Martin Gundersen](#) 28. mai 2022 153



*From the National Broadcasters website (nrk.no) - headline: "SSB demands to know exactly what Norwegians buy in the grocery store"*

SSB's experience with the media is largely positive. Journalists are interested in our facts, numbers, and research, but they rarely focus on the overall development and improvement of official statistics. There are occasional inquiries regarding the quality of the published statistics, but overall, there is a high level of trust in SSB among the media. This is confirmed in the Peer Review of 2021.<sup>4</sup> Our role is mainly "the expert" providing background knowledge and serving as a sparring partner for the journalist in the attempts of the latter to interpret a given event or course of events on the public agenda.<sup>5</sup>

In this case our role in the media changed: A tech-journalist from NRK (the Norwegian Public Broadcaster) found a conflict of interests and gave voice to "the good helpers" who wanted to reveal the villain. The good helpers in this case are the privacy advocates who on behalf on the man in the street, claim that SSB put Norwegians right to privacy at risk. They do not differentiate between data being collected for the purpose of official statistics or data collected by the government bodies or social platforms like Facebook. The villain is SSB.

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<sup>4</sup> [Peer Review report Norway 2021.pdf](#)

<sup>5</sup> [\(PDF\) The interaction between experts and journalists in news journalism \(researchgate.net\)](#)

The escalation started in April 2022, when we published our plans on [ssb.no](https://ssb.no): “New data sources gives new possibilities”. We didn’t expect any reaction or interest from the media, but already in May this tech-journalist was interested in talking to us. We invited him to give background information and an interview to explain why we asked for the grocery chains’ receipts and Nets’ bank transactions and how the outcome would benefit society. When the news was published<sup>6</sup> all our messages were part of the story, however the main focus was the opponents asking why a governmental body needed detailed information about all Norwegians. The news was among the top stories of [nrk.no](https://nrk.no), which has a daily coverage of 1,6 million readers<sup>7</sup> and is the second biggest on-line news-provider in Norway.

A quote in the article from a researcher from the Norwegian University of Science and Technology shows the news angle: “*How detailed maps of our lives do the state apparatus really need to make good decisions?*” The journalist’s main sources were two privacy researchers who both argued against SSB’s need for access to these types of data. The grocery chains also provided quotes, expressing their difficulties with the obligation SSB had imposed. The news article featured a comment section that quickly filled up with remarks from angry individuals. Their main reaction was that SSB’s desire to retrieve data was entirely unacceptable from a privacy standpoint. Many also concluded that if this were to happen, they would only use cash from now on and never use cards. Additionally, there was a significant number of posts suggesting that our request for new data was part of state surveillance.

The tech-journalist from [nrk.no](https://nrk.no) published a total of three articles. In his next article, the main source – and SSBs opponents were politicians. “*The Green Party opposes increased data collection: Statistics Norway needs a reality orientation*”<sup>8</sup>. In this article, our main message was that SSB welcomes a debate about our mission, but also that we strongly emphasize that we are an independent organization producing statistics for the benefit of society. The last article was published in November, when the Norwegian DPA came with its warning of a ban: “*Statistics Norway wants your food receipts: The Norwegian Data Protection Authority warns of a ban*”<sup>9</sup>. In this article the journalist has no new sources but gives voice to the arguments of the director general of the DPA and our own director general.

In addition to [nrk.no](https://nrk.no), there was a major media report in the online finance news, E24,<sup>10</sup> but this news included only the obvious sources: the grocery chains, the DPA and SSB. This coverage led to a tv/ radio-debate in the popular program NRK Dagsnytt 18, a program that features the most important debates in Norway. Our Director General debated the Director of Communication from the DPA. During this debate, we conveyed our main messages. This debate was followed by a chronicle in E24 from our Director General.

When the DPA issued press releases, we also experienced media interest from foreign newspapers. The main topics were privacy and GDPR.

In May 2023 the DPA launched their final decision, in which the Authority prohibits the data collection that SSB has imposed on Norwegian grocery stores. The media attention following this

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<sup>6</sup> [SSB krever å få vite nøyaktig hva nordmenn kjøper i matbutikken \(nrkbeta.no\)](https://nrkbeta.no)

<sup>7</sup> [Offisielle digitale tall fra Kantar \(medietall.no\)](https://medietall.no)

<sup>8</sup> [Miljøpartiet ut mot økt datafangst: – SSB trenger en realitetsorientering \(nrkbeta.no\)](https://nrkbeta.no)

<sup>9</sup> [SSB vil ha dine matkvitteringer: Datatilsynet varsler om et forbud \(nrkbeta.no\)](https://nrkbeta.no)

<sup>10</sup> [SSB vil ha matkvitteringen din – dagligvarekjeder protesterer – E24](https://e24.no)

last press release was not as high as before, and only the Director General in the DPA was quoted. The news was spread in the leading newspapers and in tech news in Norway, however only as a short notice. The prevailing impression is that the contested data collection has been halted and won by the DPA and the privacy advocates.

## 3 Communication strategy and lessons learned

### 3.1 Our communication strategy

In 2020 the Communication department was requested to collaborate with the project leader for the new HBS in developing a communication strategy. The key challenge for the communication was outlined in this question: “Is society confident that SSB can use new, private data sources to produce good official statistics?” The communication strategy elaborates on this theme, recognizing that big data from the private sector is a novel and demanding domain. When working with the strategy we also discussed how to explain and assure that SSB will safeguard privacy concerns also for transaction data used to produce official statistics. We were aware that some groups would be concerned that SSB would have too much data about Norwegian citizens’ behaviour. Neither SSB nor other statistical agencies had previously used continuous streaming of privately held data for official statistics.

In the working group, we deliberated on how to articulate and ensure that official statistics protect privacy concerns, also for this type of data. We identified groups that would express concerns about SSB demand for data. There had already been many discussions in SSB about how this kind of data might be perceived as too invasive, and there was a concern that it would be difficult to explain the person in the street why we needed such a vast amount of data to produce valid consumer statistics. The question we asked ourselves was whether SSB holds a position of confidence in society, that will allow us this access to grocery receipts and bank transactions, and to link these data, in order to gain insights about peoples’ shopping habits. However, the discussions before the new Statistics Act was finalised gave us reason to believe we had a high standing and an updated Act to lean on.

In the strategy we comment that we should explore and describe what societal benefits SSB believe improved statistics will have, and we concluded that we had important messages that needed to be developed more extensively:

- how the new Statistics Act gives us new opportunities to produce better statistics and ensure that we are society's most important supplier of facts;
- taking our social mission seriously means making good use of multiple data sources, including transaction data, and having the expertise to handle the data for the benefit of society;
- the societal benefits of using new, privately held data;

We also concluded that our main target groups were:

- external co-partners, such as the Norwegian Directorate of Health, and others asking for new and updated statistics about the consumer;
- data owners, such as the grocery chains and NETS Norway;
- SSB’s owner: The Ministry of Finance;
- employees in SSB.

## 3.2 From strategy to detailed plans in 2022

Before publishing our cost-benefit assessment and imposing the legal obligation of data reporting for the four grocery chains and NETS Norway in May 2022, we had implemented the communication plan:

- We had discussed our plans with external partners.
- There had been several dialogue meetings with data owners.
- SSB's owner was informed.
- Employees of SSB were informed.
- We published a news article on [ssb.no](https://ssb.no) which explained the societal benefits of using new data sources for the HBS, and we responded to all media inquiries.

### 3.2.1 Stakeholders

The project leader, our Data Protection Officer and the Director for Social statistics had several meetings with external partners and data owners to present our plans. We were left with an impression that the dialogue was constructive, leading to a shared understanding of our purpose and the value new official statistics holds for society.

Looking in the rearview mirror, we do ask ourselves if there was less of a shared understanding than our impression at the time of the above-mentioned meetings. There are maybe two answers to this. One is that there are different views also within the same organisations, depending on their roles. We didn't convince the Data Protection Officers in the grocery chains, but other roles may have found our arguments valid. The other answer is that stakeholders may support you in a meeting, but the benefit for them to stand up for us when the conflict escalates were close to zero.

### 3.2.2 Internal communication

Open and transparent communication is a core value in our internal communication, and of course also in this case. We knew there were several opinions within the organisation about the decision to ask for receipts and bank transaction. Some groups were mostly interested in the potential of the new data sources, others were more concerned about the public opinion. Therefore, it was important to give insights to the discussion and decisions.

We had several news on the intranet to explain our plans about the use and exploration of these data, and to give insights both from our director general and the project leader to these internal SSB-discussions.

After imposing the legal obligation, we continued with internal meetings and news on the intranet:

- The project leader, our lawyer and data protection officer explained why we want to explore new data sources for the Household Budget Survey, i.e. the value of these data and the process leading to the legal obligation of disclosure.
- On the intranet we repeated the messages from the internal meetings and had an interview with the technical staff to explain in more detail what we are doing.

Eventually the main task was to keep employees informed about the escalation from the DPA until their final ban in May 2023.



### 3.2.3 Media

Our relationship with the media is characterized by openness and service. We prioritize timely responses to journalists' inquiries and questions, and we provide media training to several experts who are available for radio and television appearances.

However, in this case we encountered a situation where we were somewhat prepared, but not to the extent required. Our media training also in this case had primarily emphasized the expert role, equipping us to elucidate the advantages of utilizing transaction data for SSB and society, while prioritizing privacy and security. Regrettably, we had not prepared on articulating our perspective from an organizational, legal, and principal standpoint in a context where the Statistics Act was not well known and understood. This deficiency became apparent during the initial interview with the tech journalist. We were not happy with the first news report. But as the case escalated with the Norwegian DPA's press release, we made a conscious decision not to engage in a public dispute with the DPA through the media. We made the strategic decision to prioritize one message in the media; emphasizing our commitment to transparency and fostering open discourse. However, we did take the opportunity to publish a chronicle that underscored the importance of reliable data for statistical purposes.

We understand that the media alone cannot contribute to a victory for us in this case. Instead, we believe our success hinges on our ability to engage effectively with our stakeholders and to cultivate strong partnerships.

### 3.3 Lessons learned

It is essential to underscore that this case represents a minor media crisis but has been a wake-up call for how we communicate our mission and mandate. We have observed a widespread perception among a significant number of Norwegians that this case has created the belief that SSB is requesting an excessive and overly intrusive amount of data concerning their daily lives. Currently, we do not possess quantitative evidence indicating a decline in public trust towards SSB. Nevertheless, it is interesting to reflect on our lessons learned:

Why is it difficult to come across in the media with our narrative? In hindsight, have we potentially overestimated the level of trust that SSB enjoys within Norwegian society, as well as the depth of understanding regarding our mandate? As mentioned in the beginning, the Statistics Act is of a new date, and Norway had a broad public discussion before implementing the Act as well as a high degree of consensus about the final version of the Act. However, these discussions did not reach the headlines in the newspapers.

Looking to public relations theory, it is advised to always anticipate the unexpected by closely monitoring what is being discussed in society and to address the potential issues identified before they escalate into a crisis.<sup>11</sup> Did we adequately perform our monitoring, especially with respect to privacy?

Privacy has become a prominent topic of discussion in Norway, as well as in Europe. The DPA is the main stakeholder of this theme. The discussion was brought to the forefront of the Norwegian public agenda by the Privacy Commission, which released an official report in

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<sup>11</sup> [\(PDF\) Breaking down the Stakeholder Environment: Explicating Approaches to the Segmentation of Publics for Public Relations Research \(researchgate.net\)](#)

September 2022; “Your privacy – our shared responsibility. Time for a privacy policy”<sup>12</sup>. The Norwegian Privacy Commission task was to map the situation for data protection in Norway and to highlight the most important challenges and developments. They reached the conclusion that one of the most significant challenges faced is the issue of privacy in digital public sector. SSB and the transaction data provided a compelling case to underscore this challenge, making it a frequent reference point for the DPA. We have been used as a case both in their podcast “Personvernpodden”<sup>13</sup> and their blog “Personvernbloggen”<sup>14</sup>. In our dialogue with the grocery chains, we have learned that they are increasingly receiving requests from customers asking for their data to be deleted. The COVID-19 pandemic and discussions surrounding privacy and contact tracing apps<sup>15</sup> have likely further intensified these concerns. The public's awareness of privacy and data-related matters has undeniably grown in recent years, particularly since the initiation of our HBS project, and we haven't been paying enough attention to this change.

In SSB's communication it has been important to emphasise our independence. We are not a part of the digital public sector. Official statistics stand as a distinct entity. Moreover, our eligibility hinges on robust data protection measures. We already handle data that we perceive as more sensitive than transaction data. Although we acknowledged the challenges associated with collecting transaction data, we did not anticipate becoming a significant player in the broader privacy discourse. If we had fully grasped our potential role in the this discourse, we could have been better prepared for the communication challenges that awaited us.

This case involves conflicting interests and cannot be resolved through communication activities. However, it underscores the criticality of articulating clear messages regarding SSB's social mission and mandate.

### 3.4 Main take aways for the communication department

We will conclude that the communication strategy gave us the right direction. Knowing what we know today, this is our most important take aways:

- **Communication strategy:** Develop a clear communication strategy that identifies your messages and values. Be consistent in your communication and make sure your messages are clear, simple, and easy to understand.
- **Be prepared:** Understand the media landscape and be aware of the potential risks and challenges associated with public awareness. Be aware of how the media works and how stories can be twisted so that you can be prepared to deal with their messages.
- **Be open and transparent:** If a conflict arises, it is important to be open and transparent in your communication. Do not try to hide information or mislead the media as this will usually worsen the situation. Be willing to answer questions and to address concerns.
- **Practice and prepare:** Complete media training to improve your communication skills and ability to handle pressure situations. Practice how to answer difficult questions and become comfortable in interviews by journalists.

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<sup>12</sup>[NOU 2022: 11 - regjeringen.no](https://www.regjeringen.no/no/dokument/nou-2022-11)

<sup>13</sup>[#2 Pølser og personvernpolitikk: Fremtidens forvaltning | Datatilsynet](https://www.datatilsynet.no/nyheter/2-polser-og-personvernpolitikk-fremtidens-forvaltning)

<sup>14</sup>[Vurdering av personvernkonsekvenser i lovprosessen - Personvernbloggen](https://www.personvernbloggen.no/vurdering-av-personvernkonsekvenser-i-lovprosessen)

<sup>15</sup>[Personvernrad i EU mener norsk app bryter med viktig personvernprinsipp \(nrkbeta.no\)](https://nrkbeta.no/personvernrad-i-eu-mener-norsk-app-bryter-med-viktig-personvernprinsipp)

- **Avoid escalation:** If you end up in a media conflict, it is important to avoid any further escalation of the situation. Avoid personal attacks or statements that could aggravate the conflict. Be focused on your messages and avoid getting caught up in unnecessary polemics.
- **Think Long Term:** Remember that media conflicts are usually temporary. Focus on protecting your reputation in the long term, work to rebuild trust and re-establish a positive relationship with the media and other stakeholders once the conflict is resolved.

## 4 Work in progress: A communication strategy to strengthen awareness about our mission

In our experience with this case, we have come to understand that despite Norway being a country with substantial trust in governmental institutions, the limited public awareness of SSB's social mission and mandate can render trust fragile, thereby constraining our potential for growth and relevance. To effectively provide daily statistics and information to the public, we rely on trust within society to streamline, develop, and execute our data collection efforts, ultimately enhancing the quality and utilization of data. However, trust is not solely derived from exceptional statistical delivery alone.

Every year, the reputation of all Norwegian governmental institutions is measured in the Ipsos profile survey.<sup>16</sup> Since 2004, the population's overall impression of SSB has improved year by year, up till 2017. In 2017 we experienced a large dip in the population's overall impression of SSB mainly because of heavy negative media coverage on a disagreement between our Director General at that time, Christine Meyer, and the Minister of Finance, Siv Jensen. This significant decline has also highlighted the fragility of the public's trust, which is reliant on their subjective perceptions rather than a comprehensive understanding of our social mission and mandate. This narrative further reinforces the notion that we cannot take the public's trust as a given and must actively work to maintain and cultivate it.

The emergence of critical voices during the transaction data case has offered us a fresh perspective on our communication with the public. It has presented us with an opportunity to enhance how we convey our social mission and mandate, as well as the societal benefits of our work. As a result, we are actively improving our communication practices through this process.

In order to enhance public awareness and foster a more resilient trust, we must dedicate greater efforts to effective communication not only about our statistics, but also about our social mission and mandate. It is crucial to convey the tangible benefits of statistics in our society and emphasize their significance. By doing so, we can establish a stronger connection between our work and its positive impact on society.

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<sup>16</sup>[Ipsos gir Folkehelseinstituttet Omdømmepriisen for 2021 | Ipsos](#)