

### **RÉSIL CONSULTATION GROUP'S REPORT**

Consultation prior to setting up the statistical directory of individuals and housing

President: Jean-Marie Delarue Rapporteur: Françoise Dupont

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## Foreword

The Résil project, as submitted to the consultation group, consists of using two directories (that are therefore exhaustive), one of the population resident in France and one of the housing stock available, in order to match (or interconnect) separate files of different types — administrative files, survey files (for example, income files and files for higher education students).

This project falls within a framework now subject to stringent national regulations (Law of 1951 on statistics, Law of 1978 on data protection and freedoms) and European laws (the General Data Protection Regulation (GDPR), which entered into force in 2018). It also sits within a context of numerous international documents on ethics and stringent statistical work.

This very precise regulation removes from general data processing that information prepared by the Official Statistics institutes (INSEE and Ministerial Statistical Offices (MSOs)) overseen by the Autorité de la statistique publique (the French Official Statistical Authority, ASP) and compiled for exclusively statistical purposes with a general interest objective. It lightens the constraints on such data. However, this processing must offer "appropriate safeguards [...] for the rights and freedoms of the data subject" (GDPR, Article 89). It must, in particular, e **necessary** in the general interest with resources **proportionate** to what is being researched.

If successful, Résil will be implemented in order to establish numbers and will therefore be of no consequence—administratively or in any other respect—to any subject whose data is collected. Its value in terms of knowledge of our society is undisputed. It broadens the possibilities of investigation in time (monitoring cohorts) and in space (smaller geographical areas). It aligns with the work in which INSEE has long demonstrated scrupulous compliance with strict conditions of method and confidentiality. In this case, moreover, particular precautions are taken, including not using the national identification number of natural persons.

However, although the principles of directories and matching (which is not a new concept) are both accepted, considerable vigilance is required on two levels: the way in which Résil is used and the way in which it is perceived and therefore accepted. The latter element is often insufficiently evaluated.

Thus, current legislation requires that particular attention be paid to the processing of so-called "sensitive" data. Data that reveals "stated racial or ethnic origin", "political, philosophical or religious beliefs", "trade union membership", "health or sexual orientation", data that is "genetic" or "biometric". There is no such information in either the directories or the data drawn from the matching to compile the Résil project. However, sensitive data may be included in the matched files. INSEE must provide every assurance that no such data will be used in Résil, even accidentally, and must offer particular guarantees in this respect.

The regulations make no specific mention of exhaustive processing, as is the case for the two Résil directories. However, exhaustivity is exacting. It brooks no concept of "roughly". Or at least, it must minimise the margin for error. Achieving this objective may lead to the use of massively increased data volumes to ensure that the objective of completeness is fulfilled. Naturally, this requirement must be delimited. Statistical perfection has its limit in complying with the protection of individuals. In other words, Résil must definitively and permanently respect the delicate balance between purpose and means. The need for statistical enquiries is easy to establish at the outset; the proportionality of the means employed is an uphill struggle.

The more extensive the work involving personal data, the greater the need for visible compliance with the standards in force. Résil must, therefore, provide INSEE and all the official statistics bodies with the opportunity to strengthen its independence and its transparency.

Though the project has the approval in principle of the consultation group, the question has been raised many times of what such an instrument could become if used not for statistical but for administrative or even policing purposes. There are times of high risk in a nation when all resources to stave off danger are sought, including those prejudicial to the freedom of individuals. Résil cannot function without a guarantee that it will always be a tool for the official statisticians alone, for the sole purpose of counting and no other. In other words, Résil must stick like a shadow

to the reality of the independence of official statistics. But this independence is fragile. INSEE and the Ministerial Statistical Offices are departments staffed by public officials under the hierarchical responsibility of ministers. The way in which the latter can choose to interfere in statistical production can be subtle... or ruthless. Résil and resultant studies must remain far removed from any interference of this kind. The Autorité de la statistique publique, set up in 2008, is tasked with ensuring that work to produce statistics is carried out in compliance with best practice. But it is also responsible for "compliance with the principle of professional independence in the design, production and dissemination of official statistics". INSEE must ascertain whether this guarantee of independence is sufficient to counter any unwelcome intrusion in Résil (and elsewhere). Maybe the size and scope of the project calls for additional guarantees of the necessary independence to come from third parties.

The same question also arises for transparency. For over seventy years, the production of statistics in France has been subject to external scrutiny by the Conseil national de l'information statistique (<u>National Council for Statistical Information, CNIS</u>), which examines all survey projects and proposes studies and enquiries, undoubtedly a highly original approach in the French administrative system. However, this body includes experts and users of statistics who are favourable to obtaining results (necessity); in other words, they are less sensitive to issues of proportionality of resources (data minimisation principle for example).

INSEE's establishment of this consultation group, after a very open presentation of the project on 28 January 2022, is a significant step towards attaining the required transparency. But there must be greater public access, on a permanent basis, for Résil and for other projects. These are exempt on account of current texts on access rights and the right of data subjects to rectify their personal information held. This exemption is offset by the clarity that must be ensured regarding data usage. The requirement for transparency therefore needs to be considered, which should alert the CNIS to new concerns, in this case the preservation of rights and freedoms (consequently, a new composition), or new forms of public participation as seen by the group in Canada or the UK for example.

Though Résil rightly opens up new and stimulating knowledge perspectives, it must also generate new guarantees regarding rights and freedoms.

These considerations would not have arisen without the investment of each member of the consultation group, who should all be warmly thanked for this; the significant and insightful work of the rapporteur, Françoise Dupont; the conscientious and ongoing support of the Secretariat-General of the CNIS, François Guillaumat-Tailliet; and the discreet but sound and precise science of Olivier Lefebvre. To each and every one, I owe a debt of gratitude.

Jean-Marie Delarue

# Summary

### A major, structuring project that raises questions

Data matching has been practised by the French Official Statistical Service since the 1960s. Over a number of years, it has undergone significant development, brought about by the increasing availability of administrative data, high performance technology resources and increased demand. These factors allow knowledge to be refined, in space (better approach geographically) and in time (understanding of individual journeys, evaluation of public policies) by facilitating cross-disciplinary approaches for multiple areas, such as employment and training. This development is not confined to France but is an international phenomenon (in countries of comparable development) encouraged by the international statistical organisations and communities.

Northern European countries have long held registries of the population for administrative use, with unique identifiers shared within departments and able to facilitate matching. This is the infrastructure on which the national statistical institutes rely to compile their social and demographic figures. For reasons detailed in the report, such a system is not envisaged, envisageable or desirable in France. Countries without population registries, such as New Zealand and Canada, are engaged in statistical directory projects intended exclusively for statistical use, to improve their production quality in the demographic and social domain. It is in this direction that INSEE is headed with the Statistical Directory of Individuals and Housing project, known in French as the "**Répertoire Statistique d'Individus et de Logements**" or Résil. This is scheduled for implementation in 2025.

Résil will comprise two exhaustive **statistical directories** covering, on the one hand, individuals residing in the national territory and, on the other, housing, and the links that bind individuals and housing. It meets several, exclusively statistical purposes:

- It will exclusively offer the Official Statistical Service a data matching solution<sup>1</sup> that improves quality, harmonisation and security when compared with current practice.
- It will shed light on the quality of statistical use of administrative sources, which constitute one of the key resources for official statistics.
- By extending existing systems, it will provide a sampling frame for surveys conducted by the Official Statistical Service amongst households, ensuring enhanced coverage.
- Résil will provide information that will help in preparing and carrying out annual censuses and extrapolating the results, like the current use of files resulting from the housing tax system.
- Finally, Résil will mean that more robust and early demographic indicators can be produced.

In concrete terms, it is an exhaustive list of entities (individuals, housing), the content of which is reduced down to only that information allowing the two files to be linked, namely, the identification keys and links between individuals and housing.

Its essential characteristics are, on the one hand, the absence of the registration number used in the "Répertoire national d'identification des personnes physiques" (National Directory for the Identification of Natural Persons) (NIR or "Social security number"), and on the other, the absence of data such as income, social category and marital status.

Updated regularly thanks to a number of administrative data sources available annually or infraannually, an initial list of which is discussed in the report, Résil will be a statistical repository on individuals and housing providing structure for demographic and social statistics. A "snapshot" of individuals and housing on 1 January will be prepared each year.

Given the exhaustive character of the two directories and the crossover of numerous sources to achieve this, an impact study is required within the meaning of the General Data Protection

<sup>&</sup>lt;sup>1</sup> This matching can relate to administrative data only or to administrative data and statistical surveys.

Regulation (GDPR). However, INSEE wishes to have a solid legal framework, with the Résil project regulated by a decree of the Council of State as of 2023.

Aware that the strong legal framework is insufficient and that it is important to have a clear social mandate, namely explicit recognition by society of the value of the project and the legitimacy of INSEE in running it, INSEE has expressed a wish to involve social representatives well upstream of the Résil project so that various points of view can be voiced and INSEE can take these into account in constructing the statistical directory and defining its use.

# An essential consultation—with the first step ensured by the group—and a significant contribution

The consultation group for the **Répertoire Statistique d'Individus et de Logements** (Résil) project, placed under the authority of the CNIS (<u>National Council for Statistical Information</u>), stems from the CNIS meeting of 28 January 2022 on matching. This meeting was the forum for presenting the Résil project and its aims for the first time, detailing the national and international statistical context for personal data matching in order to gather the opinions of societal representatives across diverse sectors (public administration, researchers, associations, trade unions, local authorities) upstream of the project. Members of the round table discussing transparency and public disclosure, who examined Résil and the legal and ethical framework of the official statistics work, stressed that this consideration of the project and the pairing should, in their opinion, be extended over a longer period for in-depth discussions with an appropriately qualified panel of experts.

INSEE therefore suggested forming a consultation group to draw up the list of questions raised by the Résil project, discuss the responses offered by INSEE, and propose concrete methods for continuing evaluations throughout the project construction period, to 2025, and beyond if necessary. The CNIS Bureau of 12 March 2022 approved the instigation and mandate (see Appendix 1) of this group.

The CNIS asked Jean-Marie Delarue, honorary State Councillor, to chair this consultation group given his expertise and recognised interest in the right to civil liberties and privacy. Not including its chair, the group comprised the Résil project manager and 14 people (see Appendix 2) with expertise likely to express societal issues regarding the project (protection of fundamental rights, protection of data from a legal and IT standpoint, statistical work, economic and social research, digital transformation, communication, ethics).

Given the focus on addressing, first and foremost, people other than the usual official statistics personnel, such as philosopher, legal experts and members of associations or think tanks, a major effort was required to ensure a summary presentation of the official statistics matching work and its national and European legal and ethical framework, and to fully explain the Résil project and its uses in the allotted time. For their part, the participants undertook considerable background work between May and October 2022 in an effort to understand the content of the work carried out by the Official Statistics services, the conditions under which it was performed and the added value engendered by Résil.

The group fulfilled its mandate, which was to understand the project, pool and address viewpoints in order to ultimately list a number of questions and concerns regarding the project, mobilise and analyse the first responses and offer safeguards for the work to come. Its contribution to the reflections of the CNIS and INSEE on constructing the project is clear, as is its support, but it is important to emphasise that there are still avenues to explore. Firstly because time was limited (seven meetings in five months, including two summer months) and the subject vast, technical and little discussed up to now; secondly because if you attempt to mobilise experts outside of official statistics, they do not consider themselves invested in the mission of representing the whole of society within this group, as their expertise makes their approach somewhat different from that of the general public, even though they contribute to understanding it; and thirdly because this is a project with a 2025 construction deadline where objectives and developments cannot be fixed once and for all.

It is therefore crucial to continue the approach as it is key to making recommendations.

### Questions and recommendations of the group (parts 5 and 6 of the report)

The group shared in advance the perceived risk that the increase in matching will encourage a tendency to "govern by numbers"; in other words, that using more data will encourage those in government to make decisions based only on quantified data. This risk does exist, but the group considered that it had more bearing on the use of data rather than its production.

The group expressed concern over the risk of misuse of Résil data or resulting data matches if this information were to leak out following a cyberattack or if the purpose were to be diverted as a result of political pressure, in the context of an authoritative regime or otherwise.

The group focused its preoccupations on three broad ideas:

- The principle of such a directory;
- The privacy breaches that could result;
- The "internal" and "external" security of the system.

The responses it gave relate to four areas.

#### A- The principle of the directory

The group acknowledged that the criterion of **necessity** was satisfactory in so far as the needs for knowledge and increased accuracy are real and there is no convincing alternative to secure improvements in this area.

It was considered that the legal basis for matching could be better assured. Matching is, in fact, not explicitly defined by laws or regulations. For the statisticians, this is a particular case of interconnection. Thus the group recommended that the legal basis for matching be clarified.

#### **B- System architecture**

The group questioned whether the methodology behind Résil meets the principle of proportionality with regard to use and the potential risks to freedoms.

It noted that the services proposed by Résil will only be accessible to agents of the Official Statistical Service, for statistical processing purposes only, and that the tool will remain under the sole control of INSEE. It asked that these elements be clearly specified in the legal texts.

The group was positive about not using the NIR and the appropriate use of the Code Statistique Non Signifiant (CSNS), a non-identifying statistical code. Management of identifiers appears satisfactory and remains strictly internal. Some will be permanent: the group asked that they be modified, like the CSNS, in the event of security problems with the system.

It also noted INSEE's assurance that no "sensitive"<sup>2</sup> data would be included in the directory and asked that any subsequent change to this point be put to the opinion of the **CNIL** (french data protection authority) and CNIS.

The group requested that existing vigilance in the field with regard to the risk of stigmatisation of social groups (by household characteristics, etc.) be reinforced on account of the increase in matching and therefore the various data available and collected for an individual, even if such information is pseudonymised.

- if it is necessary to safeguard human life;
- if its use is justified by public interest and authorised by the CNIL;

<sup>&</sup>lt;sup>2</sup>Sensitive data represents a particular category of personal data. This is information that reveals the stated racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership of a natural person, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The European regulation prohibits such data from being gathered or used except, notably, in the following cases:

<sup>•</sup> if the data subject has given their express consent (active, explicit approach, preferably in writing, which must be free, specific and informed);

<sup>•</sup> if the information is manifestly made public by the data subject;

<sup>•</sup> if it concerns members or followers of a political, religious, philosophical, political or trade union association or organisation.

It is proposed to retain data for ten years in an active database, i.e. for the purposes of managing production of the Résil directory. At the end of this period, information on people who have died or left the territory and on housing that has been destroyed or is no longer used for residential purposes will be deleted. Anyone residing in a stable fashion in France will remain on file in the directory with a history of residential movements over ten years. This option was allowed, for the sole requirements of official statistics.

The directory itself will be populated by different existing administrative files, notably intended to compensate for the disappearance of the housing tax fiscal files. Some files will definitely be used whilst others may be subject to a technical feasibility study or an assessment of their statistical relevance (enhanced quality of the directory) and proportionality of processing.

The group<sup>3</sup> was against using files of residence permits for foreigners (AGEDREF) due to the sensitive issue of foreigners having residence permits. It also expressed an unfavourable opinion, based on an image risk and non-proportionality, regarding the VITALE health insurance card files and the RNCPS files (Répertoire National Commun de la Protection Sociale, the national social security directory, itself a compilation of files from various social security agencies).

In general, and in addition to the sources presented to it, the group drew INSEE's attention to the use of three types of data: consumer data, information from security files (such as automated fingerprint files) and health data.

Information security must be guaranteed by INSEE, which bears responsibility for the system and the data it processes. The precautions to be taken by the Institute in this regard, which are aligned with a stringent information security policy operated by INSEE and more generally by the government, appeared appropriate to the group, even though there are no absolute guarantees in matters of security. The group recommends a regular security audit by an external firm.

#### C- Procedures for adopting and monitoring the system

The group was in favour of having the project regulated by a Council of State decree passed on the advice of the CNIL.

The group recommends that the data sources comprising the directories of individuals and housing should be included in a simple decree or regulation passed based on the opinions of the CNIS and CNIL, to ensure that the principles of necessity and proportionality are evaluated for each source used. These texts should be updated on the advice of the CNIL and CNIS each time the list of sources is modified.

The group recommends that the CNIS Bureau and the competent committees be regularly informed of the progress of Résil.

The group recommends continuing consultation on the Résil project throughout its construction, and broadening the focus on matching. It particularly suggests holding a meeting with the CNIS to discuss matching and the implementation of Résil in the first quarter of 2025, such meeting being similar to the CNIS meeting on matching of 28 January 2022. Concerning Résil and data matching, direct consultation of a citizens' panel—as practised in the UK for certain projects on digital themes—could be useful and could even be extended to other official statistics projects.

The group recommends that the CNIS express its thoughts on the desirability of matching carried out by the Official Statistics services, taking account of the ethical dimensions and those linked to individual rights and freedoms. For this, the group recommends broadening the mandates of the CNIS and modifying its composition to incorporate four or five members with expertise in the field of freedoms and data protection.

The group also recommends mobilising the ASP (OS Authority) to prevent the risks of misuse that would contravene the rules set out: the ASP must be able to act preventively if the services are under pressure and report any misuse. It is important that this body be regularly informed of the progress of the project and of its use.

#### D- Public presentation of the project and how it will be used

Transparency must remain paramount when implementing Résil:

<sup>&</sup>lt;sup>3</sup> Details are provided in Part 5.3.7

- The group recommends opening up a very comprehensive public channel to present Résil, its purpose, the expected contributions, the means of data protection, the legal texts and the deliberations of the CNIL.
- The group recommends publishing the list of matchings created thanks to Résil and the processing manager, the sources used, the purpose of the processing and the populations concerned in order to demonstrate its compliance with the principles of necessity and proportionality.

More broadly, the group suggests developing communication with the public on the use of administrative sources and data matching, drawing on the best practices of foreign national statistics institutes, particularly Canada's.

The group considers that even though its report is the result of significant educational efforts and clarification, it does not constitute a suitable document on Résil, the use of administrative sources and matching for the public at large. To achieve this, a more in-depth approach and the set-up of an appropriate device are needed.

The group recommends the use of a focus group for preparing information for public circulation.

# **Appendices**

Appendix 1: Mandate of the consultation group Appendix 2: List of members of the consultation group Appendix 3: List of interviewees

### Appendix 1: Mandate of the consultation group



**Group mandate** 

Consultation prior to setting up the statistical directory

of individuals and housing

#### Background

INSEE has committed to devising a system of statistical directories of individuals and housing (Résil) for the benefit of all Official Statistics services, which is scheduled for implementation in 2025.

Building a statistical repository on individuals and housing that will enrich the statistical data available within the Official Statistical Service by combining several sources of information from different services constitutes a structuring project for demographic and social statistics. It fulfills three different purposes:

- Résil offers a data matching service that increases efficiency and quality and harmonises methods.
- As a point of reference for comparison, Résil allows the quality of administrative sources—one of the key official statistics resources—to be measured.
- By extending existing systems, Résil will provide a sampling frame for surveys conducted by the Official Statistical Service amongst households, ensuring enhanced coverage.

A meeting<sup>4</sup> organised by the CNIS on 28 January this year was the forum for presenting this project to potential users and societal representatives, with the day devoted largely to the matching of socio-demographic data to produce official statistics.

The Résil statistical directory project was presented to the CNIL in December 2021 and January 2022 as part of a request for advice in preparing the impact analysis and consolidating the legal basis of the project. A decree of the Council of State is in preparation to provide a suitable legal framework at the beginning of 2023 so that developments can continue on a sound footing.

### **Objectives**

The meeting of 28 January highlighted questions regarding the conditions under which matching is performed, and resulted in a request for continued discussions, encompassing varied standpoints on the topic in order to provide further explanations, set out the consequences and support the deployment of the project.

In this context, in order to favour communication and transparency regarding the Résil project and ensure full acceptance of the official statistics process by civil society, the CNIS has commissioned a consultation group to continue the process started at the meeting of 28 January.

<sup>&</sup>lt;sup>4</sup> https://www.cnis.fr/evenements/appariements-de-donnees-individuelles-entre-richesse-de-linformationstatistique-et-respect-de-la-vie-privee/?category=1067 videos and summary are available in english

### The group's objectives will be

- to list the questions raised by this project
- to discuss the answers provided by INSEE
- to propose concrete ways to pursue the reflections throughout the construction of the project and, if necessary, beyond.

It will thus contribute to the data protection impact analysis provided for in the General Data Protection Regulation (GDPR).

### **Composition of the group**

The group is chaired by : Jean-Marie Delarue, honorary member of the Council of State<sup>5</sup>. The rapporteur is: Françoise Dupont, Résil project, INSEE

The group will be composed of qualified personalities with diverse profiles (lawyers, sociologists, computer scientists, elected officials, journalists, etc.) to shed light on the social acceptability of the project, and personalities in charge of the protection of data and liberties or in charge of the representation of citizen (human rights league, defender of rights, associations...).

#### **Operating mode**

The working group will hold four or five half-day sessions. In order to carry out its work, the working group will benefit from introductory presentations during the first session on the project. It will audition as needed, qualified individuals who can answer questions that the project may raise and can give information on measures in order to limit its impact. A bibliography will be provided.

### Work Schedule

The working group will present the progress of its work in June and will deliver its conclusions in a report at the end of September 2022.

<sup>&</sup>lt;sup>5</sup> The Council of State (Conseil d'État) is a judge that settles disputes between citizens and administrative authorities. It ensures that the rights and freedoms of each citizen are respected by administrative authorities. It also serves as a legal advisor to the Government and Parliament, suggesting improvements to their bills and legislative proposals to ensure the new laws entering into force are clear, effective and comply with the existing body of law.

### **Appendix 2: Members of the consultation group**

Chaired by Jean-Marie Delarue<sup>6</sup>, Honorary State Councillor

Rapporteur : Françoise Dupont, Insee

Support : François Guillaumat-Tailliet, Cnis

Cédric Afsa, former Cnis

#### 15 Members\*

- Maryse Artiguelong, Vice-president of the French League of Human Rights
- Jennyfer Chrétien, Head of the Think tank "Renaissance numérique" on digital transformations<sup>7</sup>
- Valérie Gayte, CFE-CGC<sup>8</sup>, Representative of the Social, Economic and Environmental Council (<u>CESE</u>) at the CNIS
- Mark Hunyadi, University of Louvain, Belgium, philosopher. For reasons of availability, Mark Hunyadi was unable to participate in the group beyond the first session.
- Alexandre Lechénet, La gazette des communes<sup>9</sup>, data journalist
- Olivier Lefebvre, Résil project manager
- Georges Louis, CFE-CGC<sup>10</sup>, National delegate, member of Economic, Social and Environmental Council (CESE)
- Michelle Meunier, Elected representative (Sénat<sup>11</sup>) and vice-president of the Senate's ethics committee
- Benjamin Nguyen, researcher<sup>12</sup>, INSA Centre-Val de Loire, head of <u>LIFO<sup>13</sup> lab</u>.
- Emamnuelle Roux, Chaudron.io<sup>14</sup>, CEO
- Marion Selz : French Statistical Society member (statistics and public policy issues group)

<sup>7</sup> Renaissance Numérique is an independent think tank dedicated to the digital transformation of our society. Its purpose is to shine a light on the changes brought about by this transformation, and to provide everyone with the tools to master it.

<sup>8</sup> Employee's union.

<sup>9</sup> Alexandre Lechenet has worked in differents newspapers. La gazette des communes is dedicated to local elected official.

<sup>10</sup> Employee's union.

<sup>11</sup> The Sénat is the upper house of the French Parliament, with the lower house being the National Assembly, the two houses constituting the legislature of France.

<sup>13</sup> LIFO is a computer sciences research lab. Research projects conducted at LIFO range from algorithmics to natural languages processing, from machine learning to massive parallelism, from model checking and certification to system security, from big data to embedded systems.

<sup>&</sup>lt;sup>6</sup> Former member of the Conseil d'Etat, former vice-president of the National Council for Statistical Information, former director of public liberties at the Ministry of the Interior, former responsible for policies on priority areas in urban policies, former member of the National Advisory Committee on Ethics for Life Sciences and Health, former head of the National Advisory Commission on Human Rights.

<sup>&</sup>lt;sup>12</sup> Researcher specialized in data protection methods.

<sup>&</sup>lt;sup>14</sup> chaudron.io : "We work to help rethink lifelong learning. Our mission is to build a learning community, online and offline, international, willing to learn how to think and build a future that blends humanism, digital technology and a world in transition, to build a caring, social, just and inclusive society".

- Roxane Silberman, Director Emeritus for research at the Centre National de la Recherche Scientifique, French data archive's (CASD) scientific advisor, member of the Cnis bureau
- Bernard Sujobert, CGT<sup>15</sup>, member of Cnis sociodemographic commission
- Cecile de Terwagne, University of Namur, Belgium, Research Centre in Information, Law and Society (<u>CRIDS</u>), research director
- Youssr Youssef, Figarodata, data journalist

\* The functions mentioned for the members of the group concern the period from May to September 2022.

<sup>&</sup>lt;sup>15</sup> Employee's union.

# Annexe 3 : List of interviewees

By the entire group	
<b>Patrick Redor</b> , Head of the Unit Legal and Litigation Affairs, Insee	The legal framework of official statistics
<b>Antoine Bozio,</b> researcher, director of the Institute of Public Policies (IPP), also president of the CNIS Commission on Public Services and Services to the Public	The use of data matching and its added value
<b>Eric Rancourt,</b> Director of Statistical Methods and Data Science, Statistics Canada	Ethics of matching at Statistics Canada
<b>Ani Todorova,</b> Head of Unit F.2 - Population and Migration, Eurostat	European ESOP regulation, population reg- isters in the Member States
Françoise Maurel, Secretary General of CNIS	CNIS' role in accessing administrative data, and data matching
<b>Serge Slama,</b> Professor of public law, member of the legal research center (CRJ), Grenoble- Alpes University,	The Résil project and the protection of fundamental freedoms. The legal framework of the Résil project
<b>Grégoire Lundi,</b> Finance sector coordinator, National Agency for Information Systems Security.	The role of ANSSI for security policies of administrations
By one part of the group	
Claude Poulain, retired from INSEE	The Safari Project and its lessons learned
<b>Daniel Agacinski,</b> General Delegate for mediation at the « Defender of Rights ». He was asked to provide his personal expertise	What are the methods of dialogue and communication with the public at large for a project like Résil?
<b>Carly Kind</b> , Director, Ada Lovelace Institute (UK)	Ethical aspects of statistical population register and matching personal data