

# Assessment of compliance with the Code of Practice for Official Statistics

## Statistics on Social Housing Lettings in England

*(produced by the Department for Communities and  
Local Government)*

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### **About the UK Statistics Authority**

The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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# **Assessment of compliance with the Code of Practice for Official Statistics**

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## ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*. Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, whilst the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, reports may point to such questions if the Authority believes that further research would be desirable.

Assessment reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code's* requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:

- i. factual evidence and assurances by senior statisticians in the producer body;
- ii. the views of users who we contact, or who contact us, and;
- iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice*.

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# 1 Summary of findings

## 1.1 Introduction

- 1.1.1 This is one of a series of reports<sup>1</sup> prepared under the provisions of the *Statistics and Registration Service Act 2007*<sup>2</sup>. The Act allows an appropriate authority<sup>3</sup> to request an assessment of official statistics against the *Code of Practice for Official Statistics*<sup>4</sup> in order for them to gain National Statistics status. This report is in response to such a request. The report covers the set of statistics reported in *Social Housing Lettings, England*<sup>5</sup> (*Social Lettings*) produced by the Department for Communities and Local Government (DCLG).
- 1.1.2 Section 3 of this report adopts an ‘exception reporting’ approach – it includes text only to support the Requirements made to strengthen compliance with the *Code* and Suggestions made to improve confidence in the production, management and dissemination of these statistics. This abbreviated style of report reflects the Head of Assessment’s consideration of aspects of risk and materiality. The Assessment team nonetheless assessed compliance with all parts of the *Code of Practice* and has commented on all those in respect of which some remedial action is recommended.
- 1.1.3 This report was prepared by the Authority’s Assessment team, and approved by the Assessment Committee on behalf of the Board of the Statistics Authority, based on the advice of the Head of Assessment.

## 1.2 Decision concerning designation as National Statistics

- 1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to any points for action in this report. The Statistics Authority confirms that the statistics published in *Social Lettings* can be designated as new National Statistics, subject to DCLG implementing the Requirements listed in section 1.5 and reporting them to the Authority by September 2014.
- 1.2.2 DCLG has informed the Assessment team that it has started to implement the Requirements listed in section 1.5. The Statistics Authority welcomes this.

## 1.3 Summary of strengths and weaknesses

- 1.3.1 *Social Lettings* is a well structured and well presented statistical report, although it would benefit from simpler language and the inclusion of a contextual framework that explained how social housing lettings contribute to housing provision in England.

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<sup>1</sup> <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

<sup>2</sup> [http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga\\_20070018\\_en.pdf](http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf)

<sup>3</sup> Subsection 12(7) of the Act defines ‘appropriate authority’ as Ministers of the Crown, Scottish Ministers, Welsh Ministers, Northern Ireland departments or the National Statistician

<sup>4</sup> <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

<sup>5</sup> <https://www.gov.uk/government/publications/social-housing-lettings-in-england-april-2012-to-march-2013>

1.3.2 Some of the key policies that underpin DCLG's official statistics have not been reviewed for some time and a considered refresh of these policies would add value more widely than *Social Lettings* – for example, around user engagement and assurance of administrative data sources.

#### 1.4 Detailed recommendations

1.4.1 The Assessment team identified some areas where DCLG should improve the production and presentation of statistics on social housing lettings. Those which are essential for DCLG to address in order to strengthen its compliance with the *Code* and to enable designation as National Statistics are listed – as Requirements – in section 1.5, alongside a short summary of the key findings that led to each Requirement being made. Other recommended changes, which the Assessment team considers would improve the statistics and the service provided to users but which are not formally required for their designation as National Statistics, are listed – as Suggestions – in section 1.6.

#### 1.5 Requirements for designation as National Statistics

1.5.1 This section includes those improvements that DCLG is required to make in respect of its statistics on social housing lettings in order to fully comply with the *Code of Practice for Official Statistics*, and to enable designation as National Statistics.

Finding	Requirement	
<p>DCLG is strengthening its dialogue with users, but does not sufficiently engage those outside of central and local government, and much of the dialogue focuses on the underlying data rather than the official statistics. DCLG should:</p>	<b>1</b>	<p>a) Take steps to develop a greater understanding of the use made of the social housing lettings statistics, beyond accessing the underlying data, and to document more fully the types of decision they inform</p> <p>b) Update its user engagement strategy to outline clearly how it is strengthening its dialogue with users about the social housing lettings statistics</p> <p>c) Publish the information that it has gathered about user experiences of the social housing lettings statistics and explain how it is responding to what it has learned</p> <p>(para 3.4).</p>
<p>DCLG has not announced recent changes to methods in advance of the release of the changed statistics. DCLG should:</p>	<b>2</b>	<p>Confirm its commitment to announce changes to methods or classifications well in advance of the changed statistics (para 3.6).</p>
<p>DCLG presents some</p>	<b>3</b>	<p>a) Provide more information to users</p>

<p>helpful information about the quality of the statistics but it is incomplete. DCLG should:</p>		<p>about the strengths and limitations of the statistics in relation to their use and potential use, including the difficulties associated with collecting data about the household income of new tenants, and how it seeks to address any limitations</p> <p>b) Present quality measures and provide more information about the accuracy of the estimates and possible sources of error and bias that might impact upon the uses of the statistics</p> <p>(para 3.8).</p>
<p>Some suppliers told the Assessment team that they have concerns that definitions are being interpreted inconsistently when they submit their administrative data. DCLG should:</p>	<p><b>4</b></p>	<p>In light of the Authority's Statement <i>Administrative Data and Official Statistics</i> and the National Statistician's recently published guidance, update its Statement of Administrative Sources to include full details about its arrangements for auditing and quality assurance of administrative data, including how it gains assurance that data suppliers are submitting data to consistent definitions (para 3.10).</p>
<p>DCLG does not publish any information about its confidentiality arrangements for <i>Social Lettings</i>. DCLG should:</p>	<p><b>5</b></p>	<p>Publish sufficient information about its confidentiality arrangements for <i>Social Lettings</i> to provide assurance in respect of all aspects required by the <i>Code</i> and, in particular, in relation to its statistical disclosure procedures (para 3.13).</p>
<p><i>Social Lettings</i> is well presented but lacks a contextual framework and the language used assumes a level of expertise. DCLG should:</p>	<p><b>6</b></p>	<p>Ensure that the commentary in <i>Social Lettings</i> is accessible to the widest possible audience, and in particular, it should provide a contextual framework and use simple language to aid user interpretation of the statistics (para 3.15).</p> <p>As part of meeting this Requirement, DCLG should consider the points detailed in annex 1 and annex 2.</p>
<p>Users experience some difficulties accessing the statistics through the GOV.UK website. DCLG should:</p>	<p><b>7</b></p>	<p>Review the accessibility of <i>Social Lettings</i> and associated data through the GOV.UK website and make appropriate improvements (para 3.16).</p>



## 1.6 Suggestions for extracting maximum value from the statistics

- 1.6.1 This section includes some suggestions for improvement to DCLG's statistics on social housing lettings, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

We suggest that DCLG:

1	Publish information alongside its statistics plan that explains its statistical planning approach and how it will alert users to any changing priorities resulting from changes in user needs (para 3.5).
2	Make it clear on its website when statistical reports include a correction notice (para 3.7).
3	Publish the outcomes of its analysis of the distributions of rents and the comparisons of mean and median values, and engage with users to understand what measures best serve their needs (para 3.9).
4	Publish information about its operational plans for collecting administrative data beyond 2014/15 and about the implications for the official statistics of any proposed change, and notify users of this information, in line with Requirement 2 (para 3.11).
5	Review with CORE suppliers the most burdensome aspects of the data collection process to establish if improvements might be made (para 3.14).
6	Consider, following its work to review the disclosure procedures applied for datasets available using the data cube facility, how it might make the dataset consistent with the annual official statistics more openly available to users (para 3.17).

## 2 Subject of the assessment

- 2.1 DCLG's annual statistical report *Social Housing Lettings, England (Social Lettings)* presents official statistics on new lettings of the existing social housing stock owned by local authorities (LAs) and private registered social housing providers (PRPs) in England. As the statistics relate only to new social lettings they represent a flow estimate. DCLG reports measures of stocks of social housing lettings in England in *English Housing Survey*<sup>6</sup> and in *Local Authority Housing Statistics for England*<sup>7</sup>.
- 2.2 Social housing lettings statistics inform housing policy in areas such as the Affordable Homes Programme<sup>8</sup>, which aims to increase the supply of new affordable homes in England, and the Strategic Housing Market Assessments by local government that form part of the National Planning Policy Framework<sup>9</sup>. Central government uses data on social housing lettings and on the housing benefit propensity of new tenants to inform modelling on the value for money of investment in new affordable housing and the housing benefit impacts of investment in new affordable housing. The social housing statistics are also used in research into areas such as rents, incomes and affordability; housing need; routes to being housed; vacancies and resident demographics; and market research and intelligence. One example is the *UK Housing Review*<sup>10</sup> which brings together a range of housing statistics for England and its regions, Wales, Scotland and Northern Ireland.
- 2.3 *Social Lettings* replaced DCLG's previous *Social Housing Lettings and Sales in England* publication from the 2012/13 reporting period onwards. The sales information is now published in DCLG's *Social Housing Sales, England*<sup>11</sup> (*Social Sales*), a National Statistics publication assessed as part of Assessment report 117<sup>12</sup>. The Authority did not assess housing lettings statistics at the same time, as DCLG only published data tables<sup>13</sup> at that point.
- 2.4 DCLG produces *Social Lettings* (and *Social Sales*) using administrative data collected from PRPs and LAs via the COntinuous REcording of Lettings and Sales in Social Housing in England (CORE) system<sup>14</sup>. PRPs and LAs that have social housing stock are required to complete on-line questionnaires or upload datasets via CORE for each new social letting to a new or existing tenant, in a new or existing property. The data are automatically validated as they are uploaded, and any queries are directed to the PRPs and LAs. CORE allows for continuous updating but has quarterly submission cut-off points. All PRPs respond by the deadlines. There is a greater tendency for LAs to submit social housing lettings data in bulk to meet the final financial year end cut off deadline

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<sup>6</sup> <https://www.gov.uk/government/collections/english-housing-survey#reports>

<sup>7</sup> <https://www.gov.uk/government/publications/local-authority-housing-statistics-for-england-2012-to-2013>

<sup>8</sup> <http://www.homesandcommunities.co.uk/affordable-homes>

<sup>9</sup> <http://planningguidance.planningportal.gov.uk/blog/policy/>

<sup>10</sup> <http://www.ukhousingreview.org.uk/>

<sup>11</sup> <https://www.gov.uk/government/collections/social-housing-sales-including-right-to-buy-and-transfers#social-housing-sales>

<sup>12</sup> <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/assessment-report-117---statistics-on-housing-in-england.pdf>

<sup>13</sup> <https://www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies>

<sup>14</sup> <https://core.communities.gov.uk/>

in June. The rate of response by LAs is improving and represented around 85 per cent<sup>15</sup> of social housing lettings in 2012/13.

- 2.5 CORE was set up in 1989 by the Tenant Services Authority (TSA), now part of the Homes and Communities Agency<sup>16</sup> (HCA), the national housing and regeneration agency for England and the regulator for social housing providers in England. TSA required PRPs to submit social housing lettings and sales information to support its regulatory function. CORE has been considerably enlarged and refined since its inception, perhaps most notably when TSA extended it to include the LA sector in 2004. In 2010/11 an internal review by TSA concluded that it no longer required the information collected. However, as the data were an important evidence base for DCLG policy and operations, DCLG took over funding of CORE and DCLG's statistics team took on responsibility for managing the CORE system. From 2010, DCLG added the CORE social housing lettings data to the single data list<sup>17</sup>, a list of all the datasets that local government must submit to central government. It remains a regulatory requirement for PRPs registered with HCA to supply the data. Submissions by those who are not registered with the HCA are voluntary – DCLG estimates that there are less than ten such PRPs.
- 2.6 The statistics team has overall responsibility for CORE but TNS<sup>18</sup> has held the contract for administering the CORE system since 2009. The current contract runs until delivery of the 2014/15 datasets. The contractor is responsible for collecting and validating the data, producing and publishing quarterly management information on the CORE website and compiling the datasets and data tables for use by DCLG in producing the social housing lettings statistics. TNS also provides a data cube facility to allow users to tailor their analyses.
- 2.7 In 2013, DCLG obtained funding from the UK Statistics Authority's Quality Improvement Fund<sup>19</sup>, and it commissioned the Methodology Advisory Service of the Office for National Statistics (ONS) to carry out a review of the methods used to produce *Social Lettings*. DCLG implemented all of the review recommendations in its 2012/13 statistical report, and published ONS's findings<sup>20</sup> alongside it in October 2013. The main improvements were to address item non-response for the household characteristics (such as age, ethnicity and economic status) by imputing for missing values, and to estimate population totals for social housing lettings, applying improved weighting methods.
- 2.8 For each of the first three quarters of the financial year, TNS publishes management information reports and datasets for social housing lettings on the CORE website based on actual returns. For the fourth quarter, publication of this information is delayed until after the publication of *Social Lettings* and the

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<sup>15</sup> DCLG provisional estimates based on responses to the *Local Authority Housing Statistics 2012/13* as of 5 September 2013:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/190627/Local\\_authority\\_housing\\_statistics\\_2012-13\\_guidance\\_notes\\_for\\_completion.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/190627/Local_authority_housing_statistics_2012-13_guidance_notes_for_completion.pdf)

<sup>16</sup> <http://www.homesandcommunities.co.uk/aboutus>

<sup>17</sup> <https://www.gov.uk/government/policies/making-local-councils-more-transparent-and-accountable-to-local-people/supporting-pages/single-data-list>

<sup>18</sup> <http://www.tnsglobal.com/>

<sup>19</sup> <http://www.ons.gov.uk/ons/guide-method/method-quality/quality/the-work-of-the-ONS-quality-centre/quality-improvement-fund/index.html>

<sup>20</sup> <https://www.gov.uk/government/publications/improving-outputs-on-social-housing-lettings>

reports and datasets released, including for the data cube, are released consistent with *Social Lettings*, including any imputation and estimation applied to derive population totals.

- 2.9 DCLG publishes *Social Lettings* in PDF with supplementary tables and charts in Excel format. DCLG also produces a series of illustrative supplementary maps, cartograms and an infographic in PDF. Access to the dataset that underpins *Social Lettings* is facilitated through the CORE website where a data cube facility allows users to produce and export their own analyses, consistent with the official statistics, for most variables. A detailed dataset including all variables is made available to users under licence. This equates to a level of three stars under the Five Star Scheme that forms part of the Open Standards Principles proposed in the *Open Data White Paper: Unleashing the Potential*<sup>21</sup> and adopted as government policy in November 2012<sup>22</sup>. Five stars represents the highest star rating within the Scheme.
- 2.10 DCLG told us that the estimated annual cost of producing *Social Lettings*, including associated contractor costs, is approximately £70,000.

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<sup>21</sup> [http://data.gov.uk/sites/default/files/Open\\_data\\_White\\_Paper.pdf](http://data.gov.uk/sites/default/files/Open_data_White_Paper.pdf)

<sup>22</sup> <https://www.gov.uk/government/publications/open-standards-principles/open-standards-principles>

### 3 Assessment findings

- 3.1 DCLG has a published strategy for engaging with users of its official statistics<sup>23</sup> with the stated aim to ‘establish and nurture a mutually beneficial partnership between the producers and users of the Department’s statistics’. However, DCLG has not updated this strategy since 2010 and it does not reflect some of the more proactive engagement that DCLG has started to undertake in recent months – for example, a user engagement day that it ran in November 2013. DCLG said that it will be reviewing this plan in summer 2014.
- 3.2 DCLG told the Assessment team that the user engagement day provided users with the opportunity to participate in workshops and share their experiences of the various statistics. DCLG said that it reviewed the feedback from the event and shared its resulting action plan with the Assessment team. DCLG told us that it will update users about the outcomes of the event and how it is responding to user needs when it next publishes *Social Lettings* in autumn 2014.
- 3.3 DCLG told the Assessment team that due to the types of users and data suppliers that attended the user engagement day – mainly central and local government, the focus was on the supply and use of the CORE social housing lettings data rather than the published official statistics. DCLG said that this was broadly true of all its engagement, including meetings with the Central and Local Information Partnership<sup>24</sup> (CLIP). The information that DCLG has published about users and uses reflects this narrow focus.
- 3.4 The Assessment team considers that there is a potentially wider audience for the official statistics and that to extract greater public value from the statistics it is important to understand what users such as the Housing Statistics Network need beyond access to the underlying data. As part of the designation as National Statistics, DCLG should:
- a) take steps to develop a greater understanding of the use made of the social housing lettings statistics, beyond accessing the underlying data, and to document more fully the types of decision they inform
  - b) update its user engagement strategy to outline clearly how it is strengthening its dialogue with users about the social housing lettings statistics
  - c) publish the information that it has gathered about user experiences of the social housing lettings statistics and explain how it is responding to what it has learned<sup>25</sup>
- (Requirement 1).
- 3.5 DCLG last published a statistics plan for 2011/12<sup>26</sup> in February 2012 – based on the outcome of its public consultation about how far the DCLG portfolio of official statistics meets users’ needs; some specific proposals for change on its draft statistics plan for 2011/12; and its response to that consultation. DCLG

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<sup>23</sup> <https://www.gov.uk/government/publications/engagement-strategy-to-meet-the-needs-of-statistics-users>

<sup>24</sup> <http://clip.local.gov.uk/lgv/core/page.do?pagelId=1>

<sup>25</sup> In relation to Principle 1, Practices 1, 2 and 5 of the *Code of Practice*

<sup>26</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/48840/2101434.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48840/2101434.pdf)

told the Assessment team that the 2011/12 plan continues to articulate its overall intentions with respect to the collection, production and publication of official statistics and that there are no plans to update it. We suggest that DCLG publish information alongside its statistics plan that explains its statistical planning approach and how it will alert users to any changing priorities resulting from changes in user needs.

- 3.6 *Social Lettings* for 2012/13 presented for the first time estimates adjusted to account for any non-response by local authorities. DCLG published a report<sup>27</sup> alongside *Social Lettings* which explained the new weighting and imputation techniques being applied and quantified for users the impact on the statistics. However, DCLG did not pre-announce this change to the methods. As part of the designation as National Statistics, DCLG should confirm its commitment to announce changes to methods or classifications well in advance of the changed statistics<sup>28</sup> (Requirement 2).
- 3.7 DCLG republished *Social Lettings* for 2012/13 twenty days after it was first published to correct two errors in one of the Excel tables. DCLG included a correction notice on the front page of the statistical report and clearly marked and quantified the revisions in the table. DCLG told the Assessment team that, due to the minor impact of the correction, it did not contact users to alert them to the change. While the Assessment team considers this a broadly proportionate response, we suggest that DCLG make it clear on its website when statistical reports include a correction notice.
- 3.8 *Social Lettings* includes information about the methods used to produce the statistics and their quality, though it does not present any quality measures. The statistical report would benefit from more information about the strengths and limitations of the statistics in relation to their use, and about the accuracy of the estimates, including any potential sources of error and bias. The Assessment team discussed with DCLG some of the potential limitations that users had highlighted, and found that DCLG has a good awareness of the issues and, in some cases, was able to describe actions that it is taking to address them. For example, *Social Lettings* effectively explains that data collected about household characteristics such as age, nationality, ethnicity and economic status have the highest levels of non-response. *Social Lettings* also quantifies the levels of non-response, how it imputes for missing values and the estimated impact on the final estimates. However, *Social Lettings* does not clearly explain why DCLG does not publish information about household income in the statistical report. Income is an area of interest to users but DCLG told the Assessment team that levels of non-response to questions about the income of households is high, at around 50 per cent, and that this is likely to be further complicated in the short term by the roll out of Universal Credit<sup>29</sup>. ONS's review (see paragraph 2.7) recommended not imputing for income, as the results would not be reliable and prone to misuse. DCLG told us that it is working with TNS to review the questionnaire design to improve the volume and quality of responses about income. ONS's review also reported that due to resource constraints, ONS was not able to provide advice about extending the

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<sup>27</sup> <https://www.gov.uk/government/publications/improving-outputs-on-social-housing-lettings>

<sup>28</sup> In relation to Principle 2, Practice 4 of the *Code of Practice*

<sup>29</sup> <https://www.gov.uk/government/policies/simplifying-the-welfare-system-and-making-sure-work-pays/supporting-pages/introducing-universal-credit>



new weighting methods to affordable rent lettings. DCLG told us that while it has no fixed plans to pursue this, it is keeping the issue under review and will investigate options for imputation.

As part of the designation as National Statistics, DCLG should:

- a) provide more information to users about the strengths and limitations of the statistics in relation to their use and potential use, including the difficulties associated with collecting data about the household income of new tenants, and how it seeks to address any limitations
- b) present quality measures and provide more information about the accuracy of the estimates and possible sources of error and bias that might impact upon the uses of the statistics<sup>30</sup>

(Requirement 3).

- 3.9 *Social Lettings* presents mean average weekly rents. Given the potential for a skewed distribution of rents payable, it might be more appropriate for *Social Lettings* to present the distribution and the median rents. Users responding to this Assessment said that they would welcome such measures being presented. DCLG told the Assessment team that it has asked TNS to provide it with means, median and distributions for all the key variables and it will then form a judgement about whether the median would be a more appropriate descriptive statistic. We suggest that DCLG publish the outcomes of its analysis of the distributions of rents and the comparisons of mean and median values, and engage with users to understand what measures best serve their needs.
- 3.10 DCLG has published a Statement of Administrative Sources<sup>31</sup>. CORE is listed in the statement with some summary information, including information about responsibilities for assuring the quality of the administrative data for its use for statistical purposes. However, the statement does not include sufficient information about DCLG's quality assurance procedures and DCLG told us that it does not have any audit arrangements in place for administrative data. One data supplier raised concerns that definitions might be interpreted differently by different LAs and PRPs and others said that they cannot always meet the exact definitions required. DCLG provided some assurances to the Assessment team about the steps that it takes to minimise this risk, through training and validation checks, but it has not published any such information. As part of the designation as National Statistics, DCLG should, in light of the Authority's Statement *Administrative Data and Official Statistics*<sup>32</sup> and the National Statistician's recently published guidance<sup>33</sup>, update its Statement of Administrative Sources to include full details about its arrangements for auditing and quality assurance of administrative data, including how it gains assurance that data suppliers are submitting data to consistent definitions<sup>34</sup> (Requirement 4).

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<sup>30</sup> In relation to Principle 4, Practices 1, 2 and 3 and Principle 8, Practice 1 of the *Code of Practice*

<sup>31</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/197885/SAS\\_\\_Final\\_draft\\_for\\_publication\\_\\_with\\_cover\\_\\_2\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/197885/SAS__Final_draft_for_publication__with_cover__2_.pdf)

<sup>32</sup> <http://www.statisticsauthority.gov.uk/assessment/monitoring/administrative-data-and-official-statistics/index.html>

<sup>33</sup> <https://gss.civilservice.gov.uk/wp-content/uploads/2012/12/Interim-Admin-Data-guidance.pdf>

<sup>34</sup> In relation to Principle 4, Practice 3 and Protocol 3, Practice 5 of the *Code of Practice*

- 3.11 DCLG's contract with TNS to operate the CORE system and collect administrative data from LAs and PRPs runs until the conclusion of the financial year 2014/15. Based on this timetable, the Assessment team would expect that DCLG will shortly make some operational decisions about how it will continue to collect the administrative data that it needs. As decisions about these data are integral to the publication of the official statistics beyond Autumn 2015, we suggest that DCLG publish information about its operational plans for collecting administrative data beyond 2014/15 and about the implications for the official statistics of any proposed change, and notify users of this information, in line with Requirement 2.
- 3.12 DCLG does not publish a general statement about how it protects the confidentiality of the data that it collects and processes for official statistics – for example, in relation to any legal obligations, roles and responsibilities assigned for protecting information, physical security arrangements or the disclosure rules that it applies. DCLG told the Assessment team that it has deliberately refrained from publishing such a statement as it has awaited changes to legislation that would have implications for its confidentiality arrangements, for example, Cabinet Office's plans to introduce data sharing legislation, and the European Union's intention to introduce a more stringent regime of regulations to safeguard citizens' privacy.
- 3.13 DCLG told us that, in the meantime, it remains satisfied that the confidentiality arrangements put in place and published by each separate statistical team are sufficient. For *Social Lettings*, DCLG told us that it has confidentiality agreements in place with TNS and that no concerns have ever been raised by data suppliers. DCLG also said that it considers that there is a very low risk of any individual being identified from the statistics. However, DCLG told us that it is reviewing its statistical disclosure controls for the data made available through its data cube facility. As part of the designation as National Statistics, DCLG should publish sufficient information about its confidentiality arrangements for *Social Lettings* to provide assurance in respect of all aspects required by the *Code* and, in particular, in relation to its statistical disclosure procedures<sup>35</sup> (Requirement 5).
- 3.14 DCLG publishes the single data list which lists all of the datasets that local government must submit to central government, and has clearly stated principles about minimising the data burden. The PRPs regulated by HCA are also required to submit data. DCLG told us that the data requirements are reviewed annually and any potential new data needs are considered against the burden on data suppliers. DCLG said it also reviews whether existing data needs are still valid. DCLG told us that this is an open and transparent process and that for the CORE datasets it maintains a list of any issues raised by users and suppliers and feeds those into the review. DCLG said that it has not made any formal assessment of the burden of the CORE collection on LAs and PRPs but that it believes that much of the information needed is already held on their management systems. However, users responding to this Assessment indicated that there is some additional burden. While this would not be a requirement of the *Code*, as the data are collected for administrative reasons, we suggest that DCLG review with CORE suppliers the most burdensome

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<sup>35</sup> In relation to Principle 5, Practices 1,2,3 and 4 of the *Code of Practice*



aspects of the data collection process to establish whether improvements might be made.

3.15 *Social Lettings* is a well-structured and well-presented statistical report that draws out the key messages effectively, and is supported with an infographic, maps and cartograms<sup>36</sup> that help bring the statistics to life. However, the Assessment team considers that *Social Lettings* should be improved in the following areas:

- a high level of understanding of housing provision is assumed – the reports lack either an introduction or an overall framework that explains how social housing lettings fit into the wider housing market. Users told the Assessment team that they would welcome the presentation of some contextual statistics about the supply and demand for housing. Examples that could add value include stocks of social housing from the English Housing Survey, and information about private lettings
- the concepts and language used in the reports might make it difficult for inexperienced users to interpret the statistics – DCLG presents a good glossary but some important terms are not explained the first time that they occur
- the reports do not make it clear that the statistics presented are estimates, and the presentation of exact numbers suggests a level of accuracy that is potentially misleading

As part of the designation as National Statistics, DCLG should ensure that the commentary in *Social Lettings* is accessible to the widest possible audience, and in particular, it should provide a contextual framework and use simple language to aid user interpretation of the statistics<sup>37</sup> (Requirement 6). As part of meeting this Requirement, DCLG should consider the points detailed in annex 1 and annex 2.

3.16 Users responding to this Assessment told the Assessment team that they experience some difficulties finding the statistics through the GOV.UK website. The Assessment team found that: there is some inconsistency in the labelling of *Social Lettings* on the DCLG pages of the GOV.UK website; the latest statistics are not displayed first; there are links to 'live tables' that are not explained; and there is no prominent link to the CORE datasets. As part of the designation of National Statistics, DCLG should review the accessibility of *Social Lettings* and associated data through the GOV.UK website and make appropriate improvements<sup>38</sup> (Requirement 7).

3.17 DCLG makes the social housing lettings statistics available as structured data tables in Excel files. The tables are clearly structured and presented, with time series included back to 2006/07. Users told the Assessment team that they would welcome the inclusion of more metadata in the Excel files. DCLG also provides a data cube facility on the CORE website to allow users to tailor their analyses and to export data consistent with the official statistics. The facility uses datasets that include most of the variables presented as part of the official statistics, on a consistent basis, but not all. More detailed CORE datasets are

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<sup>36</sup> A diagrammatic presentation in abstracted or simplified form, on a map base or distorted map base

<sup>37</sup> In relation to Principle 8, Practice 2 of the *Code of Practice*

<sup>38</sup> In relation to Principle 8, Practice 4 of the *Code of Practice*

available only under licence. We suggest that DCLG consider, following its work to review the disclosure procedures applied for datasets available using the data cube facility, how it might make the dataset consistent with the annual official statistics more openly available to users.

## Annex 1: Compliance with Standards for Statistical Reports

- A1.1 In November 2012, the Statistics Authority issued a statement on *Standards for Statistical Reports*<sup>39</sup>. While this is not part of the *Code of Practice for Official Statistics*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*. In relation to the statistical reports associated with DCLG's social housing letting statistics, this annex comments on compliance with the statement on standards.
- A1.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical reports, we encourage the producer body to apply the standards as fully as possible.

### **Include an impartial narrative in plain English that draws out the main messages from the statistics**

- A1.3 *Social Lettings* is a well-structured statistical report with a very clear front page that presents the main messages alongside a contents summary. The main messages discuss the latest statistics in the context of longer term trends.
- A1.4 The introduction in the statistical report explains that the statistics include information about social lettings by LAs and PRPs, and that it only relates to new social lettings. However, it does not set the statistics within the framework of the wider housing market and housing provision in England, which would provide some helpful context about the supply and demand for social housing.
- A1.5 The introduction also directs users to a list of definitions, though it would be helpful to the non-expert user if some of the key terms were defined as they are introduced, for example, assured and secured tenancies.
- A1.6 Where *Social Lettings* presents time series, it discusses trends and possible reasons for change – for example, a change in policy or a switch from LA to PRP provision. The statistical report could helpfully present more analyses of time series, to aid interpretation of the statistics. Average rents are only compared with the previous year and DCLG presents only a snapshot for the latest year of the characteristics of households taking up social lettings. In both cases it is difficult to get a sense of any changing patterns and trends and what these might tell us.
- A1.7 *Social Lettings* presents mean average rents. Given the potential for a skewed distribution, it might be more appropriate for *Social Lettings* to present the distribution and the median rents.

### **Include information about the context and likely uses of the statistics**

- A1.8 The technical notes of the statistical report include a summary of the different users and uses of the data and some information about related government policy such as the Affordable Homes Programme<sup>40</sup>. However, the focus is primarily on the use of the underlying raw data rather than the official statistics, and this is mirrored in the engagement strategy that DCLG provides a link to. The Assessment team considers that understanding more about the potential uses of the official statistics might better inform their development.

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<sup>39</sup> <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

<sup>40</sup> See footnote 8

## **Include information about the strengths and limitations of the statistics in relation to their potential use**

- A1.9 *Social Lettings* does not make it clear that the statistics presented are estimates, and the presentation of exact numbers suggests a level of accuracy that is potentially misleading. The statistical report includes some information about the limitations of the statistics as context for its decision to use weighting and imputation techniques to adjust for non-response. However, *Social Lettings* could helpfully present more information about the strengths and limitations of the statistics in relation to their use and potential use, and how it seeks to minimise any limitations – for example, the low response to questions about household income.
- A1.10 *Social Lettings* does not include any measures of quality or information about potential errors and bias in the statistics.
- A1.11 *Social Lettings* includes information about the revisions policy for these statistics and the nature of the revisions to the statistics. *Social Lettings* for April 2012 to March 2013 also includes a link to an article quantifying the revisions due to the introduction of weighting and imputation techniques to account for any non-response.

## **Be professionally sound**

- A1.12 The commentary is generally consistent with the statistics. The Assessment team identified one exception where the long term growth in social lettings between 2007-8 and 2012-13 for general needs is described in the text as being 3 per cent. This appears inconsistent with the statistics presented in Table 1 of the statistical report. Any charts are clearly presented and labelled and the statistical report makes good use of maps and cartograms. A larger group of maps is also made available in an accompanying Excel file. Some of the maps are presented with a detailed geographical breakdown. It might be helpful to provide users with versions of the maps that allow them to easily identify the LA areas, for example, with a mouse over. DCLG also publishes a helpful infographic alongside the statistics that draws out the key messages.

## **Include, or link to, appropriate metadata**

- A1.13 The title of the statistical report clearly conveys its contents. Contact details for the responsible statistician and the timing of the next release are presented prominently.
- A1.14 *Social Lettings* includes technical notes that briefly describe the data collection, and directs users to more information about the data source. However, more information is needed about the methods for producing the statistics, including about validation and quality assurance processes.
- A1.15 *Social Lettings* includes links to similar statistics for other countries in the UK, and to a range of related data for England, for example, housing stock. No links are provided to equivalent international statistics.
- A1.16 *Social Lettings*, data tables, maps and infographics are all accessible from a single page on the GOV.UK website. Each section of *Social Lettings* clearly cross-references to the appropriate data tables. The GOV.UK webpage includes links to 'live tables' but it is not clear what these are and how they are

associated with *Social Lettings*. Links are also provided to core datasets and online reporting tools (for licensed users).

## Annex 2: Summary of assessment process and users' views

- A2.1 This assessment was conducted from December 2013 to May 2014.
- A2.2 The Assessment team – Oliver Tatum and Donna Livesey – agreed the scope of and timetable for this assessment with representatives of DCLG in December. The Written Evidence for Assessment was provided on 7 March. The Assessment team subsequently met DCLG during March to review compliance with the *Code of Practice*, taking account of the written evidence provided and other relevant sources of evidence.

### Summary of users contacted, and issues raised

- A2.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare Assessment reports.
- A2.4 The Assessment team received 17 responses from the user consultation. The respondents were grouped as follows:

Central government	3
Local government	4
Representative and professional bodies	2
Devolved government	1
Housing association	1
Academic	1
Data suppliers	5

- A2.5 Some users reported that they only use the official statistics in support of their use of the underlying administrative data available from the CORE website. Central government users told us that the statistics inform national housing policy on topics including affordable housing. Local authorities use the statistics as an evidence base for developing local housing strategy, for example, the Strategic Housing Market Assessments, and for making regional comparisons. Other reported uses included research in areas such as rents, incomes and affordability; housing need; routes to being housed; vacancies and resident demographics; and market research and intelligence.
- A2.6 Users told us that they are broadly happy with the statistics and that they value the data made available on the CORE website. They also said that they welcome any information provided about the strengths and limitations of the statistics. Where users had been in contact with the DCLG statistics team they have generally found the statisticians to be helpful, though many of the users are also data suppliers and so they often contact TNS directly. Users did express some confusion about how to find official statistics on the GOV.UK website with many stating that for ease they accessed the statistics indirectly through the CORE website. One user suggested the introduction of a facility

with search criteria to help users locate statistics and related datasets. There appears to be some inconsistency in how users are updated about the latest releases, with some receiving email alerts while others requested that this feature is introduced.

- A2.7 A number of users identified some perceived limitations with the statistics. User needs included: more metadata in the Excel tables; information about population distributions as well as mean estimates; more contextual information and analysis of trends; and indicators of levels of confidence in the estimates. Users expressed concerns about increasing levels of non-response for household income variables; breaks in time series due to changes in collection methods; and potential gaps in the statistics, for example, information about the previous tenure of new tenants and indicators of local turnover in relation to housing stock levels. Users also expressed concerns that data suppliers may be interpreting the definitions and data requirements inconsistently. Some suppliers acknowledged that they cannot always apply the exact definitions. Some users (also suppliers) said that they had noted differences between the data that they supplied and that published.
- A2.8 While the data suppliers collect most of the data for their own purposes, they told us that some additional data collection is required to meet CORE requirements. Data suppliers said that they invest a lot of time in answering automated queries about the administrative data submitted via CORE. Some suppliers told us that they are consulted directly about changes to data requirements while others said they are only informed, but in good time to implement any changes. One supplier specifically suggested that coordination between TNS and the companies providing the software systems for suppliers could be improved.

### **Key documents/links provided**

Written Evidence for Assessment document

