

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Housing and Planning in Scotland

(produced by the Scottish 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 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 reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The Act requires all statistics currently designated as National Statistics to be assessed against the *Code of Practice for Official Statistics*³. The report covers the following sets of National Statistics produced by the Scottish Government:

- *Housing Statistics for Scotland; Key Trends Summary*⁴; and
- *Scottish Vacant and Derelict Land Survey (SVDLS)*⁵

1.1.2 The Act also allows Ministers to request an assessment of other official statistics in order for them to gain National Statistics status. This report also covers the following official statistics, released through the following publication, in response to such a request:

- *Affordable Housing Securing Planning Consent (AHSPC)*⁶.

1.1.3 This report is shorter than normal. In particular, section 3 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 materiality⁷. 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.

1.1.4 This report was prepared by the Authority's Assessment team, and approved by the Board of the Statistics Authority 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 the products listed in paragraph 1.1.1 can be designated as National Statistics,

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

² http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf

³ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

⁴ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Housing-Regeneration/HSfS>

⁵ <http://www.scotland.gov.uk/Publications/2011/01/24153858/0>

⁶ <http://www.scotland.gov.uk/Publications/2011/09/20144032/0>

⁷ <http://www.statisticsauthority.gov.uk/assessment/assessment-guidance-about-assessment/criteria-for-deciding-upon-the-format-of-an-assessment-report.pdf>

and has determined that the statistics published in the product listed in paragraph 1.1.2 can be designated as new National Statistics products, subject to the Scottish Government implementing the enhancements listed in section 1.5 and reporting them to the Authority by March 2012.

1.3 Summary of strengths and weaknesses

- 1.3.1 The Scottish Government engages effectively with a wide range of users of housing and planning statistics through its Built Environment Statistics Advisory Committee. Separate working groups have also been established to provide advice on specific user and data collection issues for the individual statistics. The Scottish Government publishes the relevant papers and minutes for meetings of these groups on its website.
- 1.3.2 The majority of data used in the production of these statistics is administrative data held by local authorities. The data are collected through a range of pre-defined spreadsheets; however the Scottish Government has not estimated the costs to Local Authorities for completing these.
- 1.3.3 *Housing Statistics for Scotland* and *Scottish Vacant and Derelict Land Survey* present useful commentary on a range of key trends in housing and land development. *Housing Statistics for Scotland* also provides links to other relevant data sources and data for the UK. The commentary in *AHSPC* is less developed and tends to report only on the statistics shown in the tables.

1.4 Detailed recommendations

- 1.4.1 The Assessment team identified some areas where it felt that the Scottish Government could strengthen its compliance with the *Code*. Those which the Assessment team considers essential to enable designation as National Statistics are listed in section 1.5. Other suggestions, which would improve the statistics and the service provided to users but which are not formally required for their designation, are listed at annex 1.

1.5 Requirements for designation as National Statistics

Requirement 1	Investigate and document the use made of the <i>Scottish Vacant and Derelict Land</i> and <i>Affordable Housing Securing Planning Consent</i> statistics (para 3.1)
Requirement 2	Provide a statement explaining the nature and extent of revisions and corrections at the same time that they are released (para 3.2).
Requirement 3	Provide more information about the quality of <i>Housing Statistics for Scotland</i> ; including estimates of the main sources of error, such as double counting of people on registered housing lists (para 3.3).

Requirement 4

Report annually the estimated costs to local authorities of providing the data used in the production of the housing and planning statistics (para 3.4).

Requirement 5

Provide more information on the quality and reliability of the housing and planning statistics in relation to the range of potential uses, and improve the commentary in *Affordable Housing Securing Planning Consent* to aid user interpretation (para 3.5).

2 Subject of the assessment

- 2.1 The Scottish Government produces a range of housing and planning statistics to inform local and national policy on the supply and demand of housing stock and available land. The statistics are used by the Scottish Government to help monitor performance against its Scotland Performs⁸ National Outcomes and Indicators. The statistics are also used by academics, consultants and charitable bodies to help monitor housing provision, particularly in areas of deprivation and urban development.
- 2.2 *Housing Statistics for Scotland; Key Trends Summary* is an annual publication that presents information about housing in Scotland. Statistics are provided on a number of topics, such as new housing supply, the Affordable Housing Investment Programme (AHIP)⁹, public sector housing stock and sales, and private sector improvement grants. The new build and new housing supply statistics are used to measure progress towards the Scotland Performs Indicator to 'increase the rate of new house building'. Local Authorities (LAs) use these statistics to plan their Housing Need and Demand Assessments¹⁰, which provide evidence for developing and monitoring local housing supply policies. This publication replaced the *Quarterly Housing Trends in Scotland*¹¹ bulletin, which was discontinued in May 2007.
- 2.3 *Scottish Vacant and Derelict Land Survey* is an annual bulletin that presents a summary of the results from the Scottish Vacant and Derelict Land Survey. The survey first reported statistics on urban vacant and derelict land in 1988 and is the only national data source on vacant and derelict land for Scotland. The data are collected by LAs and transferred to the Scottish Government for analysis. The statistics are used by the Scottish Government to monitor the reuse of vacant and derelict land and to inform the allocation of the Vacant and Derelict Land Fund¹². Local authorities use to statistics to identify available land supply to meet their housing requirements.
- 2.4 *Affordable Housing Securing Planning Consent* is published annually; it presents key statistics from the survey of Planning Authorities on the amount of affordable housing granted planning consent during the financial year. The survey began collecting annual data in 2005, in response to the *Planning Advice Note 74*¹³ (PAN74) issued by the Scottish Government. PAN74 advises that there should be regular monitoring of local authority progress in meeting affordable housing contributions.
- 2.5 The Scottish Government estimates that the annual cost of producing these housing and planning statistics is around £64,000.

⁸ <http://www.scotland.gov.uk/About/scotPerforms>

⁹ AHIP is a Scottish Government programme that funds housing for rent and low cost home ownership. The majority of funding is provided to Registered Social Landlords (RSLs), although funding is also provided to individuals, councils and private developers.

¹⁰ <http://www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/guidance>

¹¹ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Housing-Regeneration/PubHousingTrend>

¹² <http://www.scotland.gov.uk/Topics/Built-Environment/regeneration/land-issues/vacant/vdlf>

¹³ <http://www.scotland.gov.uk/Publications/2005/03/20796/54073>

3 Assessment findings

- 3.1 The Scottish Government engages effectively with the users of housing and planning statistics through a range of committees and working groups administered through its ScotStat user network¹⁴. The Built Environment Statistical Advisory Committee¹⁵ (BESAC) meets twice yearly and acts as a useful liaison point between the Scottish Government, the users of housing and planning statistics, and the data providers. The Committee consists of users within the Scottish Government, along with representatives from LAs, academia and charities. The Scottish Government has also established some smaller groups¹⁶ to support and address specific issues with the housing and planning statistics. For example, a working group for *SVDLS* meets annually to discuss and agree any changes to the management of the data collection and statistics. Whilst there is good user consultation, the Scottish Government provides little information about the range of uses made of the *AHSPC* and *SVDLS* statistics on its website or within the publications. As part of the designation as National Statistics, the Scottish Government should investigate and document the use made of the *SVDLS* and *AHSPC* statistics¹⁷ (Requirement 1).
- 3.2 The statistics team told us that it follows the published organisational revisions policy¹⁸ for housing and planning statistics. The most recent *SVDLS*, published in January 2011, includes detailed information about the nature of revisions and corrections; however, the extent of changes to historical statistics is not clear. *SVDLS 2010* also notified users about a number of small revisions that had been made to previous statistics due to more accurate data provided in the annual survey. As part of the designation as National Statistics, the Scottish Government should provide a statement explaining the nature and extent of revisions and corrections at the same time as they are released¹⁹ (Requirement 2). We also suggest that the Scottish Government provide links to the published revisions policy in the housing and planning publications covered by this assessment.
- 3.3 The Scottish Government commissioned Omnibus Surveys in August 2010 and February 2011 to investigate the amount of double counting²⁰ in the administrative data for those people on registered housing lists. The Scottish Government has published the results of these surveys, conducted by Ipsos Mori, on its website²¹, and included links to these in *Housing Statistics for Scotland*. The publication provides a short overview of this research, but it is not clear whether the findings about double counting have been used in the production of these statistics, and no information is provided about how the results should be interpreted. *Housing Statistics for Scotland* does not provide much information about the quality of the statistics. The Scottish Government

¹⁴ <http://www.scotland.gov.uk/Topics/Statistics/scotstat>

¹⁵ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Housing-Regeneration/scotstat/meetings>

¹⁶ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Housing-Regeneration/scotstat/workgroups>

¹⁷ In relation to Principle 1 Practice 2 of the *Code of Practice*

¹⁸

<http://www.scotland.gov.uk/Topics/Statistics/About/CPsonRevisionsCorrections/Q/EditMode/on/ForceUpdate/on>

¹⁹ In relation to Principle 2 Practice 6 of the *Code of Practice*

²⁰ Double counting occurs when a person is registered on more than one LA or Housing Association housing list

²¹ <http://www.scotland.gov.uk/Topics/Statistics/Browse/Housing-Regeneration/HSfS/HousingListSurvey>

told us that the accuracy and completeness of AHSPC data has been queried by analysts; in future LAs will be asked to complete a common monitoring template for AHSPC data in an attempt to improve this, although this template is not a mandatory requirement. *SVDLS* presents more detailed information about the quality and interpretability of the statistics in a separate annex. As part of the designation as National Statistics, the Scottish Government should provide more information about the quality of *Housing Statistics for Scotland*, including estimates of the main sources of error, such as double counting of people on registered housing lists²² (Requirement 3).

- 3.4 The majority of the data used in the production of the housing and planning statistics are administrative data held by LAs. LAs are responsible for completing pre-defined spreadsheets and transferring these to the Scottish Government. The costs to LAs in completing the statistical returns have not been estimated. As part of the designation as National Statistics, the Scottish Government should report annually the estimated costs to LAs of providing the data used in the production of the housing and planning statistics²³ (Requirement 4). The Scottish Government told us that it is developing an online data collection system to collect unit-level data more efficiently from LAs.
- 3.5 *Housing Statistics for Scotland* provides a short introduction and a useful key points section at the start of the release. *SVDLS* and *AHSPC* present a more detailed background section at the start of the release, but little explanation of the key statistics is presented within *AHSPC*. The commentary in *Housing Statistics for Scotland* and *SVDLS* provides useful policy and operational context to the statistics, while that in *AHSPC* is less developed. In addition, the publications do not contain much information about the quality and reliability of the statistics in relation to the range of potential uses. As part of the designation as National Statistics, the Scottish Government should provide more information on the quality and reliability of the housing and planning statistics in relation to the range of potential uses, and improve the commentary in *Affordable Housing Securing Planning Consent* to aid user interpretation²⁴ (Requirement 5). We suggest that the Scottish Government consider the points detailed in annex 2, in seeking to improve the housing and planning releases.
- 3.6 The Scottish Government told us that it is planning to review its housing and planning publications in order to produce more user-friendly 'thematic-style' reports. The publications will be reviewed with the aim of including statistics from other sources, and more topical discussion, rather than reporting only on the statistics produced for the release.
- 3.7 The Scottish Government provides pre-release access to its housing and planning statistics to around 20 individuals. We suggest that the Scottish Government publish records of those granted pre-release access to these statistics in their final form.

²² In relation to Principle 4 Practice 2 of the *Code of Practice*

²³ In relation to Principle 6 Practice 1 of the *Code of Practice*

²⁴ In relation to Principle 8 Practice 1 and Practice 2 of the *Code of Practice*

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to the Scottish Government's housing and planning statistics, 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.

- | | |
|---------------------|---|
| Suggestion 1 | Provide links to the published revisions policy in the housing and planning publications (para 3.2) |
| Suggestion 2 | Consider the points detailed in annex 2, in seeking to improve the housing and planning releases (para 3.5) |
| Suggestion 3 | Publish records of those granted pre-release access to these statistics in their final form (para 3.7) |

Annex 2: Compliance with Standards for Statistical Releases

A2.1 In October 2010, the Statistics Authority issued a statement on *Standards for Statistical Releases*²⁵. Whilst 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 releases associated with housing and planning statistics in Scotland, this annex comments on compliance with the statement on standards.

A2.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical releases, we encourage the producer body to apply the standards as fully as possible.

Appropriate identification of the statistics being released

A2.3 The title of each publication describes the coverage of the statistics. The National Statistics logo is included on the front cover of *Housing Statistics for Scotland* and *SVDLS* and all publications identify the originating department. The contact details for the responsible statistician are given at the back of each publication. The publications include a short introduction to the statistics with an outline of the topics presented.

Include commentary that is helpful to the non-expert and presents the main messages in plain English

A2.4 *Housing Statistics for Scotland* includes useful commentary on the policy context of these statistics, such as the National Indicator to increase new housing building, and the impact on the sales of social housing as a result of changes to the Housing (Scotland) Act 2011. *SVDLS* provides a useful analysis of the statistics. However, the presentation of large reference tables within the text does not aid interpretation. The commentary in *AHSPC* does not provide users with an understanding of the policy or operational context within which the statistics have been produced. The explanation of the statistics in *AHSPC* outlines rises and falls but has little further explanation to describe what the statistics are showing. The text primarily describes what the relevant graph, diagram or table is showing. *SVDLS* contains detailed maps that are difficult to interpret.

Use language that is impartial, objective and professionally sound

A2.5 The text is impartial and evidence-based. The commentary in all of the publications contains descriptive statements that are consistent with the statistics. *AHSPC* does not provide a clear explanation of 'commuted payments' and how this should be interpreted.

A2.6 The text includes useful and professionally sound comments on changes. Percentage change figures are mainly used to compare changes over the period.

²⁵ <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html>

Include information about the context and likely uses

A2.7 The releases do not provide much information on how the statistics are used for example, by government, local authority and housing associations, amongst others. The publications also do not provide detailed information on the quality and reliability of these statistics in relation to the range of potential uses.

Include, or link to, appropriate metadata

A2.8 *Housing Statistics for Scotland* contains useful links to other relevant sources of data for Scotland, but it does not provide any discussion about the comparability of these data. *AHSPC* does not provide an indication of the number of secured planning consents that have been completed, although links are provided to where this information can be found. *AHSPC* does not provide much information on the comparability of these statistics.

A2.9 No indication is given of comparability with statistics in other UK countries or internationally. *Housing Statistics for Scotland* includes various links to statistics on housing in other UK countries, hosted on the Department for Communities and Local Government (DCLG) website. The Scottish Government told us that DCLG has produced a document outlining the different methods and classifications used to compile housing statistics across the UK, and the implications of this for comparability. This document is yet to be published by DCLG; links will be provided to this from the Scottish Government website when available.

Annex 3: Summary of assessment process and users' views

A3.1 This assessment was conducted from June to September 2011.

A3.2 The Assessment team – David Duncan-Fraser and Phil Grigor – agreed the scope of and timetable for this assessment with representatives of the Scottish Government in June. The Written Evidence for Assessment was provided on 14 July. The Assessment team subsequently met the Scottish Government during September 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

A3.3 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.

A3.4 The Assessment team received 10 responses from the user consultation. The respondents were grouped as follows:

Local Authority	9
Research Consultancy	1

A3.5 The respondents to our consultation were generally content with the statistics presented in the housing and planning publications. One user suggested that more information on rent and house price trends by tenure could be provided in the annual summary of *Housing Statistics for Scotland*. It was also suggested that SVDLS could usefully provide more information and analysis relating to the amount of vacant and derelict land being brought back into use in each LA over a longer time period.

Key documents/links provided

Written Evidence for Assessment document

