

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

## Traveller Caravan Count in England

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

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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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## NATIONAL STATISTICS STATUS

National Statistics status means that official statistics meet the highest standards of trustworthiness, quality and public value.



All official statistics should comply with all aspects of the *Code of Practice for Official Statistics*. They are awarded National Statistics status following an assessment by the Authority's regulatory arm. The Authority considers whether the statistics meet the highest standards of Code compliance, including the value they add to public decisions and debate.

It is a producer's responsibility to maintain compliance with the standards expected of National Statistics, and to improve its statistics on a continuous basis. If a producer becomes concerned about whether its statistics are still meeting the appropriate standards, it should discuss its concerns with the Authority promptly. National Statistics status can be removed at any point when the highest standards are not maintained, and reinstated when standards are restored.

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# 1 Summary of findings

## Introduction

- 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 *Count of Traveller Caravans England*<sup>5</sup> (*Traveller Caravan Count*), produced by the Department for Communities and Local Government (DCLG).
- 1.2 This report was prepared by the Authority's Assessment team, and approved by the Regulation Committee on behalf of the Board of the Statistics Authority, based on the advice of the Director General for Regulation.

## Decision concerning designation as National Statistics

- 1.3 The Authority judges that the statistics covered by this report do not fully comply with the *Code of Practice for Official Statistics* in the ways summarised in paragraph 1.9. The Authority judges that the statistics published in *Traveller Caravan Count* cannot be designated as National Statistics until the Authority has confirmed that appropriate actions have been taken by DCLG to meet the Requirements listed in paragraph 1.9. DCLG is expected to report its completed actions to the Authority by July 2016.
- 1.4 DCLG has informed the Assessment team that it has started to implement the Requirements listed in paragraph 1.9. The Authority welcomes this.

## Summary of strengths and weaknesses

- 1.5 There is very little available in the way of an evidence base about Travellers in England, and while information was collected for the first time about the ethnic group 'Gypsy or Irish Traveller' in the 2011 Census, *Traveller Caravan Count* has generally represented the most comprehensive source of statistics about Travellers, having been collected on a fairly consistent basis since 1979. While users recognise that it is a fairly blunt measurement instrument – providing snapshot counts of caravans on authorised and unauthorised sites twice a year and nothing of the numbers and characteristics of the people occupying those caravans – it is valued by users and is most useful in examining medium to long term trends. The publication of site-level information is also a key strength of the statistics.

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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/collections/Traveller-caravan-count>

- 1.6 However, there is a fairly strong consensus among users and data suppliers that the counts presented in *Traveller Caravan Count* are not an accurate representation of the numbers of Traveller caravans in England and that there is a range of limitations to the statistics. DCLG does not present any information about these limitations and how they impact the use of the statistics, or about the quality assurance arrangements for these statistics. While we recognise that there is a new team of statisticians producing these statistics, which is still learning, DCLG does not convey a good sense of the uses of the statistics and the strengths and limitations of the statistics in relation to those uses. It does not engage with organisations representing and working with Travellers and its engagement with local authorities (LAs) is limited – as well as limiting its understanding of the decisions that the statistics inform, we consider that the lack of dialogue restricts DCLG’s ability to improve the quality and accuracy of the statistics.
- 1.7 DCLG does not publish all of the information collected as part of the count and it does not make optimal use of the data, or other related sources, to provide insight for users. Without the context of the primary uses that the statistics are designed to meet and the limitations of the data, *Traveller Caravan Count* is potentially open to misuse.

### Detailed recommendations

- 1.8 The Assessment team identified some areas where it felt that DCLG should improve the production and presentation of statistics on Traveller Caravans. 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 paragraph 1.9, 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 support of the associated Requirement.

### Requirements for designation as National Statistics

- 1.9 This paragraph includes those improvements that DCLG is required to make in respect of its statistics on Traveller Caravans in order to fully comply with the *Code of Practice for Official Statistics*, and to enable designation as National Statistics.

Finding	Requirement	
The statistics team at DCLG engages with policy colleagues and LAs but these links need to be strengthened. DCLG does not engage	1	a) Establish effective methods of engagement with a wide range of relevant users and potential users, including organisations representing Travellers, and publish information about users’ experiences of the statistics, data

<p>more widely, for example, with organisations representing Travellers. DCLG does not have a good sense of the range of uses of the statistics and the decisions that they inform. DCLG should:</p>		<p>quality and the format and timing of their dissemination</p> <p>b) Publish clear information to explain the range of uses of <i>Traveller Caravan Count</i> including how these statistics are used by local and central government to measure performance or achievement against targets</p> <p>c) Explain how it ensures that the statistics are produced to high professional standards to inform effective decision making and democratic debate, taking into consideration the Authority's <i>Official Statistics, Performance Measurement and Targets</i></p> <p>(para 3.3).</p> <p>In meeting this Requirement, we suggest that DCLG consider if it would be appropriate for statisticians to be engaged earlier in discussions with policy colleagues that concern potential changes to definitions and methods.</p>
<p>DCLG does not publish sufficient detail about the methods for producing <i>Traveller Caravan Count</i> or the rationale for the choice of methods, within the context of use. DCLG does not publish all of the information that it collects. DCLG should:</p>	<p>2</p>	<p>a) Publish a detailed account of the methods used to produce <i>Traveller Caravan Count</i>, including concepts and definitions, the instructions issued to LAs, and the rationale for the choice of methods within the context of use</p> <p>b) Publish a plan to review the data sources and methods used to produce the experimental statistics about the count of caravans occupied by Travelling Showpeople, to ensure that they are produced to a level of quality that meets users' needs. Clearly describe the criteria that it will apply when considering if it can remove the 'experimental' label from the statistics</p> <p>c) Review what further value it could add to the understanding of the topic of Traveller caravans through using more of the information that it collects from LAs and publish the outcomes of this review</p> <p>(para 3.7).</p>
<p>DCLG does not publish sufficient information about the strengths and</p>	<p>3</p>	<p>a) Publish information about the strengths and limitations of <i>Traveller Caravan Count</i>, and about the potential sources of</p>

<p>limitations of the statistics, or about the potential sources of error and bias. The data used to produce the statistics in <i>Traveller Caravan Count</i> are collected and recorded by LAs in a range of different ways and there are a number of challenges to accurate recording. The limitations of the statistics have been highlighted in previous reviews but there has been little progress to address them and there is no evidence of a programme of continuous improvement. DCLG should:</p>	<p>error and bias, including seeking to quantify item non-response bias</p> <ul style="list-style-type: none"> <li>b) Publish information about its quality assurance arrangements for <i>Traveller Caravan Count</i> that demonstrates a good understanding of the different collection arrangements and their impact on the quality of the statistics, including seeking to quantify any uncertainty around the estimates associated with the difficulties of conducting a comprehensive count. DCLG should revisit the points raised by <i>Counting Gypsies &amp; Travellers: A Review of the Gypsy Caravan Count System</i></li> <li>c) Taking into consideration the Authority's <i>Data Quality Assurance Toolkit</i>, detail its judgement about the quality of the statistics, and the rationale for this judgement</li> <li>d) Reflecting on its engagement with users, and the limitations of the statistics, publish a prioritised development plan for <i>Traveller Caravan Count</i> explaining the rationale for its decisions on priorities. Consider as part of this plan the feasibility of publishing a continuous rather than snapshot measure for unauthorised sites</li> </ul> <p>(para 3.11).</p> <p>In making this Requirement, we acknowledge the resource constraints faced by DCLG statisticians and so, to aid prioritisation and to manage users' expectations about the pace and scope of development, we suggest that DCLG consider and communicate developments within the context of three categories, those that:</p> <ul style="list-style-type: none"> <li>a) Could be addressed within the constraints of current data collection methods</li> <li>b) Would rely on information not currently collected by DCLG but that is potentially available from LAs and other data sources with minimal additional resource and burden</li> <li>c) Would require investment in a</li> </ul>
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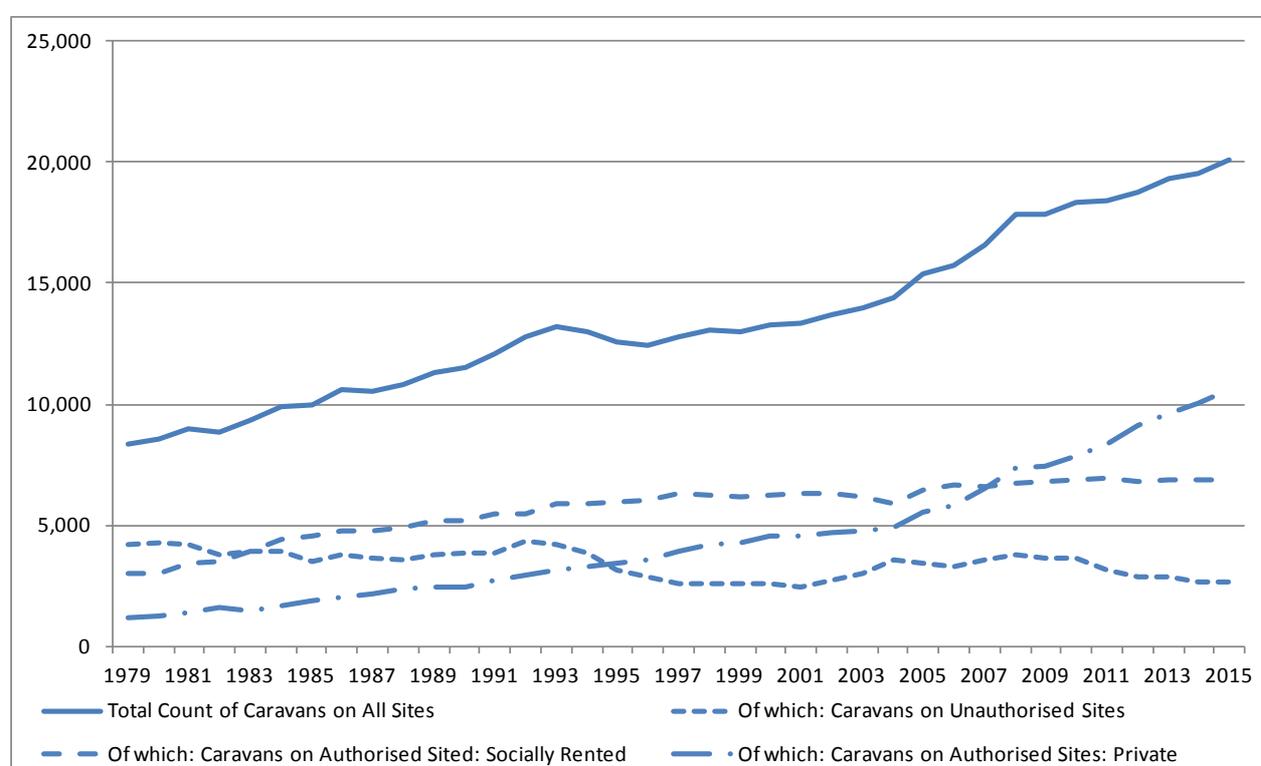
		programme of development supported by strategic partnerships
DCLG publishes a brief narrative in the statistical report but could better utilise the data collected, and other contextual sources, to provide greater insight for users. DCLG should:	<b>4</b>	<p>Improve the value of <i>Traveller Caravan Count</i> and aid user interpretation by:</p> <ul style="list-style-type: none"> <li>a) Including a contextual narrative about the framework for the Traveller Caravan Count and the associated policies, drawing on other data sources as appropriate to provide insight for users</li> <li>b) Presenting a regional perspective, including harmonised coding of LA datasets to allow users to easily re-use the data for regional analysis</li> <li>c) Providing information about the comparability of <i>Traveller Caravan Count</i> with similar statistics for the other countries of the UK</li> </ul> <p>(para 3.15).</p> <p>In meeting this Requirement, we suggest that DCLG consider the Authority's <i>Standards for Statistical Reports</i>.</p>
DCLG presents its data tables in Excel format but told us that it is also seeking to increase the amount of data that it releases in open formats. DCLG should:	<b>5</b>	<ul style="list-style-type: none"> <li>a) Review, and update where necessary, the formats in which it publishes the data associated with <i>Traveller Caravan Count</i> in order to balance the needs of users and the government's open data policy</li> <li>b) Consider how it can help users locate <i>Traveller Caravan Count</i> more easily</li> </ul> <p>(para 3.16).</p>
LAs submit data to DCLG via an on-line reporting system. LAs are able to view each other's returns before the official statistics are published. DCLG is reviewing these arrangements. DCLG should:	<b>6</b>	<p>Publish details about the arrangements for data sharing with LAs once it has completed its review and made any changes necessary, ensuring that the arrangements are consistent with the <i>Code</i></p> <p>(para 3.17).</p>
DCLG told us that it does not publish scheduled revisions for these statistics. The information about revisions in the statistical report is confusing. DCLG should:	<b>7</b>	<p>Publish clear information about its revisions policy for <i>Traveller Caravan Count</i> in the statistical report</p> <p>(para 3.18).</p>

## 2 Subject of the assessment

### Introduction

- 2.1 DCLG's *Count of Traveller Caravans England (Traveller Caravan Count)* is the most timely and comprehensive source of published information about the number of Traveller caravans, and the location and size of authorised Traveller sites in England, with statistics available from 1979.
- 2.2 For the purposes of these statistics DCLG defines Travellers more broadly than traditional and ethnic Gypsies and Travellers. *Traveller Caravan Count* concerns numbers of caravans and pitches, not people and their characteristics – please see Annex 2 for a brief glossary of terms.

**Figure 1: Count of Traveller Caravans in England, 1979 – 2015 (January Counts)**



Source: DCLG *Traveller Caravan Count*, January 2015

### Users and uses

- 2.3 DCLG uses the Traveller caravan statistics to inform the government's *Planning Policy for Traveller sites*<sup>6</sup> – the statistics are used to identify the need for authorised site provision and to inform the government's efforts to reduce the number of unauthorised sites. DCLG makes direct policy use of the statistics to calculate the payment of the New Homes Bonus<sup>7</sup> (NHB) to LAs – these payments are linked to increases in affordable housing options, including authorised residential pitches for Traveller caravans.

<sup>6</sup> <https://www.gov.uk/government/publications/planning-policy-for-Traveller-sites>

<sup>7</sup> <https://www.gov.uk/government/publications/2010-to-2015-government-policy-house-building/2010-to-2015-government-policy-house-building#appendix-8-new-homes-bonus>

- 2.4 There are no national targets for providing pitches for Gypsies and Travellers. *Planning Policy for Traveller sites* states that 'Local Planning Authorities should set pitch targets for Gypsies and Travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of Travellers in their area, working collaboratively with neighbouring local planning'. The policy says that LAs should assemble an evidence base to inform their local plans. Some LAs use *Traveller Caravan Count* as part of that evidence base, and to provide a national context for planning in their area – for example, to gain a general sense of the proportion of Travellers' accommodation needs that can be met by authorised sites and to present business cases for the development of new sites. The *Housing and Planning Bill 2015-16*<sup>8</sup> going through the UK Parliament includes amendments that would 'move away from separate definitions in housing legislation to make clear that when authorities are carrying out a review of housing needs that it considers the needs of all the people residing in or resorting to their district, without any references to Gypsies and Travellers'. Some LAs use the Traveller Caravan Count to inform housing needs assessments
- 2.5 Organisations working with, or on behalf of, Travellers use the statistics to understand and highlight the need for accommodation and supporting services such as health and education in local areas and to inform campaigns and policy development. As well as making direct use of the Traveller Caravan Count, organisations use the statistics to help verify their own surveys and estimates of provision and need. The lists of authorised socially rented sites and their capacity are also used to support advice services that help Travellers to locate authorised sites with potential spaces when they are new to an area. Planning and legal services representing clients who are Travellers use the information when making applications for planning permission for sites and evidencing appeals cases in relation to Enforcement Notices, Stop Notices or Injunctions by the Local Planning Authority. The Planning Inspectorate asks that this evidence be provided.

## User views

- 2.6 As part of this assessment we spoke with a range of users from central government, local government and organisations representing and working with Travellers. Users told us that they want statistics to help them answer different types of questions and provided some feedback about how well *Traveller Caravan Count* provides those answers:

*What is the overall demand for sites and pitches – nationally, regionally and locally – and what is the capacity of authorised sites to meet that demand?*

- *Traveller Caravan Count* is valued as the only regularly available comprehensive information about the numbers and locations of Traveller caravans and sites in England – users are very concerned not to lose it
- Users recognise that the count is a fairly blunt instrument that is best suited to examining trends over the medium to long term and for providing a national context. At a local level, most users said that they use the statistics

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<sup>8</sup> As at 13 October 2015: <http://services.parliament.uk/bills/2015-16/housingandplanning/documents.html>

together with other sources of information – for example: their own research and surveys; needs assessments; information from the 2011 Census; the School Census; and media coverage

- Users generally considered that the authorised site numbers present a fairly accurate picture of local socially rented provision of pitches. However, most users raised concerns about the accuracy of the statistics about private authorised site provision and about numbers of caravans on unauthorised sites (which serve as a proxy for unmet demand) and want to see an improvement in their reliability and trustworthiness. Some users referred us to [Counting Gypsies & Travellers: A Review of the Gypsy Caravan Count System](#) and said that a number of issues identified by that report in 2004 still hold true. Users (including those supplying data to DCLG) gave a number of examples of potential sources of error and bias in the statistics – these are detailed in paragraph 3.8 of this report
- Users told us that a count twice a year is not appropriate for capturing information about unauthorised sites and some suggested that a more continuous recording method would be better. Some LAs that we spoke to are already collecting this information

*How has the relationship between the supply and demand for authorised pitches changed over time?*

- The availability of a long consistent time series is seen by users as a key strength of the Traveller Caravan Count

*Where are each of the authorised sites located – private and socially rented – and what is the capacity/occupation rate for each individual site? What are the numbers, location and size of unauthorised sites?*

- Users told us that they appreciated the LA and site-level information that is published but some users said that site-level data should be published for all sites, not just the authorised socially rented sites – one user said that this would also help with quality assuring the LA returns
- Users would welcome the addition of regional codes to the datasets, and a move away from the simple alphabetical ordering of LAs, to allow them to focus on a particular region. Some users told us that they have to spend time coding and mapping the data each time that they are published. Users also said that DCLG could make the site-level data easier to find – one planner said that in their experience LAs really struggle to find time series for their area

*What are the numbers of Gypsies and Travellers and their characteristics – for example, to help with planning education and health services?*

- *Traveller Caravan Count* measures numbers of caravans and is not concerned with measuring numbers of people and their characteristics. Users said that they would like DCLG to explain more clearly what the Traveller Caravan Count does and doesn't include and how it is used. Users in LAs who also supply data to DCLG said that as planning requirements have changed in recent years, a number of LAs have started to collect more information that DCLG could potentially draw on to improve its statistics, and to include more information about numbers of Gypsies

and Travellers and their characteristics. Some users also suggested that DCLG could explore improved links with organisations that have strong relationships with Travellers to see what advice they might offer.

## Subject of this Assessment

2.7 DCLG publishes *Traveller Caravan Count* as part of its portfolio of official statistics about Housing in England. It includes information about caravans lived in by Traditional and Ethnic Gypsies and Travellers and members of non-traditional New Traveller groups. *Traveller Caravan Count* presents the number of Traveller caravans on Traveller sites with breakdowns by type of site (authorised: public and private; and unauthorised: on and not on land owned by Travellers) and by LA. *Traveller Caravan Count* also presents information about the location and capacity of each of the authorised socially rented sites. *Traveller Caravan Count* is published twice a year (in June and November) based on counts taken in January and July. A count is also taken in January of the number of caravans occupied by Travelling Showpeople<sup>9</sup>.

## History

2.8 DCLG and predecessors have published counts of Traveller caravans in England since 1979. In 2004, the Office of the Deputy Prime Minister (now DCLG) commissioned a review of the Count from the University of Birmingham's Centre for Urban and Regional Studies: *Counting Gypsies & Travellers: A Review of the Gypsy Caravan Count System*<sup>10</sup> – this review is discussed further in Section 3 of this report. In 2011<sup>11</sup>, DCLG extended its data collection to include information on new affordable residential pitches to inform the government's NHB scheme. *Traveller Caravan Count* has included information about Travelling Showpeople since 2011 as experimental statistics. In January 2013, the title of the statistics changed to *Traveller Caravan Count* from *Gypsy and Traveller Caravan Count* – there was no change in the coverage of the statistics.

## Methods and sources

2.9 LAs provide counts or estimates of Traveller caravans on sites and encampments in their area to DCLG twice a year – in January and July. The rationale for taking counts in winter and summer is to account for different seasonal patterns in winter and summer. While there is no statutory requirement, LAs must submit the information as part of the Single Data List<sup>12</sup>, a list of all datasets that local government must submit to central government. The response rate for January 2015 was 92 per cent – when an LA fails to

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<sup>9</sup> Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such)

<sup>10</sup> <http://bemis.org.uk/resources/gt/uk/2006%20-%20counting%20gypsies%20and%20Travellers%20-%20areview%20of%20the%20gypsy%20caravan%20count%20system.pdf>

<sup>11</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/11799/Guidance\\_notes\\_for\\_July\\_2011\\_count.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/11799/Guidance_notes_for_July_2011_count.pdf)

<sup>12</sup> <https://www.gov.uk/government/publications/single-data-list>

submit data, DCLG carries forward the estimates for that area from the corresponding count the previous year.

- 2.10 DCLG advises LAs of the dates on, or around, which the counts should be taken and asks that LAs visit all known authorised and unauthorised sites and encampments within their boundaries. DCLG issues guidance notes to LAs about how to complete the on-line survey forms.

## Related statistics

- 2.11 The Welsh Government publishes official statistics about Traveller caravans for Wales<sup>13</sup>. These statistics do not form part of this assessment. No official statistics are published for Scotland and Northern Ireland. The Scottish Government has published *Evidence Base on Gypsies and Travellers in Scotland*<sup>14</sup> and for Northern Ireland, the Northern Ireland Housing Executive publishes details of its Traveller accommodation needs assessments and land identification process<sup>15</sup>.
- 2.12 For the first time, the 2011 Census ethnic group question included a dedicated tick box for the ethnic group Gypsy or Irish Traveller<sup>16</sup>. Using the data, ONS published an article: *What does the 2011 Census tell us about the Characteristics of Gypsy or Irish Travellers in England and Wales?*<sup>17</sup>, which explores the characteristics of the Gypsy and Irish Traveller community, including their accommodation.
- 2.13 Department for Education produces *Schools, Pupils and their Characteristics*<sup>18</sup> using data collected as part of the school census that includes a breakdown by LA and school type of the numbers of pupils by ethnic group including Irish Traveller and Gypsy/Roma.

## Accessibility and costs

- 2.14 DCLG publishes *Traveller Caravan Count* in PDF format, with supplementary data tables published in Excel format. This equates to a level of two 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>19</sup> and adopted as UK government policy in November 2012<sup>20</sup>. Five stars represents the highest star rating within the Scheme.
- 2.15 DCLG estimates that its own costs of producing *Traveller Caravan Count* are approximately £35 thousand per year. DCLG estimates that the cost to LAs of

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<sup>13</sup> <http://gov.wales/docs/statistics/2015/150326-gypsy-Traveller-caravan-count-january-2015-en.pdf>

<sup>14</sup> <http://www.gov.scot/Topics/People/Equality/Equalities/GypsyTravellerScotland>

<sup>15</sup> <http://www.nihe.gov.uk/Travellers>

<sup>16</sup> This tick box was not intended for people who identify as 'Roma' as they are a distinct group with different needs to Gypsy or Irish Travellers

<sup>17</sup> <http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/what-does-the-2011-census-tell-us-about-the-characteristics-of-gypsy-or-irish-travellers-in-england-and-wales-/index.html>

<sup>18</sup> <https://www.gov.uk/government/collections/statistics-school-and-pupil-numbers>

<sup>19</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>20</sup> <https://www.gov.uk/government/publications/open-standards-principles/open-standards-principles>

conducting the count or providing estimates is approximately £70 thousand per year.

### 3 Assessment findings

#### User engagement

- 3.1 DCLG has published a user engagement strategy<sup>21</sup> that explains its range of mechanisms for engaging with users of its statistics, including *Traveller Caravan Count*. However, while DCLG periodically hosts large user events to discuss a wide range of topics – the last one was in 2013<sup>22</sup> – DCLG told us that it does not engage widely with users of *Traveller Caravan Count* (for example, groups representing and working with Travellers) except in response to direct enquiries. DCLG told us that the statisticians have good working relationships with policy colleagues within the Department and that it liaises regularly with LAs about *Traveller Caravan Count* through the Central and Local Information Partnership (CLIP) Planning Statistics Sub-Group<sup>23</sup>. However, while we found that there was evidence of day-to-day routine engagement to provide briefing for Ministers, answer Parliamentary Questions and to refine guidance notes for LAs, we did not get a sense of any strategic discussions with these users that would help to inform the ongoing value and relevance of the statistics. For example, in August 2015, DCLG published a policy response to a user consultation: *Planning and Travellers: Proposed Changes to Planning Policy and Guidance*<sup>24</sup> that quoted the official statistics from *Traveller Caravan Count* about numbers of caravans on authorised sites. One of the outcomes of this consultation was to change the definition of a Traveller for planning purposes and DCLG published an update to the Government's *Planning Policy for Traveller Sites*<sup>25</sup>. DCLG statisticians told us that they had not been aware of this announcement and that there had not been any discussions with policy colleagues, or other users, about what the changes to planning policy might imply for the value of the statistics to decision making. During the course of this assessment DCLG statisticians told us that policy colleagues have now invited them to join their regular quarterly meetings with representatives of Travellers. We welcome this development.
- 3.2 *Planning Policy for Traveller Sites* encourages LAs to formulate an evidence base to inform planning for Gypsy and Traveller needs in their area. Some LAs told us that they now collect additional information to supplement their local Traveller caravan counts in order to maintain such an evidence base. DCLG told us that it has not discussed with LAs what additional information is now available that might inform the development of the official statistics, but told us that it would seek to explore this – the minutes of the January 2014 CLIP Planning Sub-Group meeting note a suggestion that it would be helpful to compare statistics in *Traveller Caravan Count* with the Gypsy and Traveller needs assessments but there is no evidence of whether that happened.

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<sup>21</sup> <https://www.gov.uk/government/publications/engagement-strategy-to-meet-the-needs-of-statistics-users>

<sup>22</sup> <http://www.statsusernet.org.uk/events/eventdescription?CalendarEventKey=bd5e1432-7fb7-497c-826b-a63ce3b93544>

<sup>23</sup> The minutes of CLIP meetings are available from KnowledgeHub if registered to the site: <https://khub.net/group/guest/my-activity>

<sup>24</sup> <https://www.gov.uk/government/publications/planning-and-Travellers-proposed-changes-to-planning-policy-and-guidance-consultation-response>

<sup>25</sup> <https://www.gov.uk/government/publications/planning-policy-for-Traveller-sites>

3.3 DCLG presents very limited information about the users and uses of the statistics, and it does not publish information about users' experiences of the statistics. A number of users told us that it would be helpful to understand more fully the different uses. As part of the designation as National Statistics, DCLG should:

- a) Establish effective methods of engagement with a wide range of relevant users and potential users, including organisations representing Travellers, and publish information about users' experiences of the statistics, data quality and the format and timing of their dissemination
- b) Publish clear information to explain the range of uses of *Traveller Caravan Count* including how these statistics are used by local and central government to measure performance or achievement against targets
- c) Explain how it ensures that the statistics are produced to high professional standards to inform effective decision making and democratic debate, taking into consideration the Authority's *Official Statistics, Performance Measurement and Targets*<sup>26 27</sup>

(Requirement 1).

In meeting this Requirement, we suggest that DCLG consider if it would be appropriate for statisticians to be engaged earlier in discussions with policy colleagues that concern potential changes to definitions and methods.

## Methods and quality

3.4 DCLG includes brief technical notes in the statistical report that explain: the basic arrangements for collecting data twice a year from LAs; the overall response rate achieved for the latest collection; and the method for imputing for missing data. DCLG does not provide any information about the data collection methods or the guidance given to LAs, and it does not explain the rationale for its choice of methods – for example, why the very simple imputation method used is preferred to more sophisticated alternatives. The concepts and definitions that are used to produce *Traveller Caravan Count* are easily open to misinterpretation and the technical notes explain only some of these concepts and definitions – for example, DCLG does not define a Traveller, a caravan or a pitch. Users told us that this lack of transparency is a key weakness of the statistics.

3.5 In January each year DCLG collects a count of the caravans occupied by Travelling Showpeople. *Traveller Caravan Count* has included these 'experimental' statistics since 2011. DCLG does not explain how and when it will review the experimental status of these statistics, or the criteria that it will consider when judging if the experimental label can be removed.

3.6 DCLG does not explain which variables are collected from LAs as part of the Traveller Caravan Count. DCLG told us that it does not publish some of the variables that it collects: site-level detail (including location and number of sites) for authorised private sites and private unauthorised sites on Travellers' own

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<sup>26</sup> <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-reviews/monitoring-review-3-2015---official-statistics--performance-measurement-and-targets.pdf>

<sup>27</sup> In relation to Principle 1, Practices 1, 2 and 5 of the *Code of Practice*

land; and rental rates for authorised social sites. DCLG told us that there is a lot of missing data for some variables – it considers that empty cells can generally be regarded as genuine zeroes but it does not provide any evidence of the rationale for this judgement or attempt to quantify item non-response.

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

- a) Publish a detailed account of the methods used to produce *Traveller Caravan Count*, including concepts and definitions, the instructions issued to LAs, and the rationale for the choice of methods within the context of use
- b) Publish a plan to review the data sources and methods used to produce the experimental statistics about the count of caravans occupied by Travelling Showpeople, to ensure that they are produced to a level of quality that meets users' needs. Clearly describe the criteria that it will apply when considering if it can remove the 'experimental' label from the statistics
- c) Review what further value it could add to the understanding of the topic of Traveller caravans through using more of the information that it collects from LAs and publish the outcomes of this review<sup>28</sup>

(Requirement 2).

3.8 Our conversations with users and data suppliers confirm that there is a range of limitations of these statistics, including known potential sources of error and bias, which DCLG does not discuss in *Traveller Caravan Count*. Examples include:

- The count is of caravans and not of people and so while it is a helpful planning tool, it is not a sophisticated measure of Travellers' needs
- A range of different methods are used to collect or estimate the data for the count
- Mistrust of LA officials among some Travellers, limiting access to sites
- LAs interpreting the scope of the count and associated definitions differently – though a number of LAs said that they considered the guidance to be clear
- The reliance of the count on the judgement of the officials to determine certain information – for example, if a caravan is occupied by Travellers
- A lack of awareness of where caravans are sited, including those in lay-bys on main roads or hidden behind buildings
- A failure to identify over-occupancy of authorised sites
- The different geographical make-up of LAs – for example, difficulties associated with covering a large rural area
- The limitations of a snapshot when compared with a continuous measure to determine needs in a local area
- The potential for political pressures to be applied locally to mis-record the count – for example, to manage public opinion or to influence local targets

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<sup>28</sup> In relation to Principle 4, Practice 1 of the *Code of Practice*

- 3.9 We consider that DCLG needs to do more to present information for users about the strengths and limitations of the statistics in relation to their use, including potential sources of error and bias. DCLG should also be seeking to better understand and to minimise the limitations – working with LAs and other organisations, including those representing Travellers. DCLG does not present any information alongside the statistics about the assurance arrangements for these statistics and its judgement of their quality, and while all the data suppliers we spoke with were conscientious about conducting the counts, some said that the perceived limitations of the checks performed by DCLG can reduce the incentive for LAs to get the figures right. We consider that while the Traveller Caravan Count is technically a survey of LAs and participation is voluntary, LAs draw on a range of administrative data sources to inform their estimates and counts, and so accordingly DCLG should consider the areas of practice in the *Administrative Data Quality Assurance Toolkit*<sup>29</sup>.
- 3.10 The findings of this assessment are broadly consistent with the 2004 Review: *Counting Gypsies & Travellers: A Review of the Gypsy Caravan Count System*<sup>30</sup>. While some of the points raised by that review have been addressed – for example, the scope of the Count is now wider than caravans lived in by ethnic Gypsies and Travellers, and includes non-traditional Travellers, making it more suitable for planning site provision, we consider that most of the issues in respect of the relevance and accuracy of the statistics remain. The review concluded that ‘overall, there is probably consensus that the count should continue. Every effort should be made to reduce the weaknesses identified and to create information which is as useful as possible’. We would echo this but we consider that with the advent of needs assessments, the potential evidence base available from LAs is better than it was ten years ago, and that DCLG should explore how it could adapt the Count to reflect this, in particular, whether it can develop more continuous estimates of unauthorised sites to provide a better measure of unmet demand.
- 3.11 As part of the designation as National Statistics, DCLG should:
- a) Publish information about the strengths and limitations of *Traveller Caravan Count*, and about the potential sources of error and bias, including seeking to quantify item non-response bias
  - b) Publish information about its quality assurance arrangements for *Traveller Caravan Count* that demonstrates a good understanding of the different collection arrangements and their impact on the quality of the statistics, including seeking to quantify any uncertainty around the estimates associated with the difficulties of conducting a comprehensive count. DCLG should revisit the points raised by *Counting Gypsies & Travellers: A Review of the Gypsy Caravan Count System*
  - c) Taking into consideration the Authority's *Data Quality Assurance Toolkit*<sup>31</sup>, detail its judgement about the quality of the statistics, and the rationale for this judgement

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<sup>29</sup> <http://www.statisticsauthority.gov.uk/assessment/monitoring/administrative-data-and-official-statistics/index.html>

<sup>30</sup> See footnote 14

<sup>31</sup> <http://www.statisticsauthority.gov.uk/assessment/monitoring/administrative-data-and-official-statistics/index.html>

- d) Reflecting on its engagement with users, and the limitations of the statistics, publish a prioritised development plan for *Traveller Caravan Count* explaining the rationale for its decisions on priorities. Consider as part of this plan the feasibility of publishing a continuous rather than snapshot measure for unauthorised sites<sup>32</sup>

(Requirement 3).

In making this Requirement, we acknowledge the resource constraints faced by DCLG statisticians and so, to aid prioritisation and to manage users' expectations about the pace and scope of development, we suggest that DCLG consider and communicate developments within the context of three categories, those that:

- a) Could be addressed within the constraints of current data collection methods
- b) Would rely on information not currently collected by DCLG but that is potentially available from LAs and other data sources with minimal additional resource and burden
- c) Would require investment in a programme of development supported by strategic partnerships

## Commentary and accessibility

3.12 *Traveller Caravan Count* is a well laid-out statistical report with a clear summary of the key points and good signposting of the supporting detail and data tables. DCLG publishes a brief descriptive narrative in support of the statistics but we consider that it could offer much greater insight for users. However, to be able to optimise the value of these statistics, we think that DCLG will first need to address the earlier Requirements in this report to clarify the uses of the statistics and to better understand and communicate the characteristics of the data that it has at its disposal. This will allow DCLG to place the statistics in their proper context and to explain them in terms that users can interpret. We also consider that DCLG should seek to explore how it might helpfully utilise other data sources such as the Census information about the characteristics of Gypsies and Travellers to help inform understanding the balance of supply and demand for Traveller sites. We know from talking to users that in addition to the national picture, users are interested in understanding the regional perspective for England. DCLG explains in its statistical reports that it does not 'include any totals for former government regions except London following the consultation on the publication of regional statistics in 2012. Further details are given in the Written Ministerial Statement of 18 December 2012'<sup>33</sup>. DCLG told us that its Head of Profession for Statistics is currently considering this strategy with a view to possibly including a greater regional dimension as part of its statistics going forward. The Authority welcomes this news. Given the nature of *Traveller Caravan Count* we would consider this an important part of the narrative for these statistics.

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<sup>32</sup> In relation to Principle 4, Practices 2, 3 and 5 of the *Code of Practice*

<sup>33</sup> <https://www.gov.uk/government/speeches/statistics-for-local-enterprise-partnerships-and-upper-tier-local-authorities>

- 3.13 We think that DCLG could deliver some early benefits for users by extending its application of harmonised geographical coding<sup>34</sup> to the data tables so that users can easily analyse the information by region as well as by LA. Users told us that they have to add their own coding each time the data is published to carry out any regional analysis and mapping.
- 3.14 Similarly, while DCLG does present some information about what statistics are available for other countries of the UK, given that Travellers move across borders we consider it important that DCLG provides users with information about the comparability of *Traveller Caravan Count* with those statistics.
- 3.15 As part of the designation as National Statistics, DCLG should improve the value of *Traveller Caravan Count* and aid user interpretation by:
- Including a contextual narrative about the framework for the Traveller Caravan Count and the associated policies, drawing on other data sources as appropriate to provide insight for users
  - Presenting a regional perspective, including harmonised coding of LA datasets to allow users to easily re-use the data for regional analysis
  - Providing information about the comparability of *Traveller Caravan Count* with similar statistics for the other countries of the UK<sup>35</sup>

(Requirement 4).

In meeting this Requirement, we suggest that DCLG consider the Authority's *Standards for Statistical Reports*<sup>36</sup>. While this is not part of the *Code*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*.

- 3.16 DCLG publishes the data tables that accompany *Traveller Caravan Count* only in Excel format. Users told us that they like the presentation of the tables within a single workbook with some helpful summary metadata. The tables also include a complete time series back to 1979 for the key headline series. However, we consider that DCLG could do more to support re-use of the data by also providing them in open data formats. DCLG told us that it is reviewing across its portfolio of official statistics which data it can make available in open formats to support re-use. While we consider that DCLG's statistics pages on GOV.UK are fairly well structured, a number of users told us they have difficulties locating the latest release. As part of the designation as National Statistics, DCLG should:
- Review, and update where necessary, the formats in which it publishes the data associated with *Traveller Caravan Count* in order to balance the needs of users and the government's open data policy
  - Consider how it can help users locate *Traveller Caravan Count* more easily<sup>37</sup>

(Requirement 5).

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<sup>34</sup> As set out in the Government Statistical Service Geography Policy: <https://gss.civilservice.gov.uk/wp-content/uploads/2015/03/GSS-Geography-Policy-is-now-available1.pdf>

<sup>35</sup> In relation to Principle 4, Practice 6 and Principle 8, Practices 1, 2 and 3 of the *Code of Practice*

<sup>36</sup> <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

<sup>37</sup> In relation to Principle 8, Practice 6 of the *Code of Practice*

## Confidentiality, equality of access and revisions

- 3.17 LAs submit data to DCLG for *Traveller Caravan Count* via an on-line reporting system. LAs told us that, in addition to their own data, they are able to view each others' returns via this system before the official statistics are published. DCLG confirmed this arrangement and said that while LAs do receive a warning message advising that all the data are subject to change before final publication, it is reviewing these data access arrangements. While we support the sharing of comparable data between LAs for planning and benchmarking purposes, we consider that it is important that DCLG considers these data-sharing arrangements within the context of the *Code* and in particular with respect to: equality of access; protecting confidentiality; promoting comparability and preventing misuse. As part of the designation as National Statistics, DCLG should publish details about the arrangements for data sharing with LAs once it has completed its review and made any changes necessary, ensuring that the arrangements are consistent with the *Code*<sup>38</sup> (Requirement 6).
- 3.18 DCLG told us that it does not publish scheduled revisions for these statistics and this is why the statistical report does not feature the nature and extent of any revisions. However, the information about revisions in the statistical report is unclear about this policy stating that: 'At the time of each count the previous returns will be reviewed for revision. Revisions to historic data (all data older than that currently due for scheduled revision) should be made only where there is a substantial revision, such as a change in methodology or definition'. As part of the designation as National Statistics, DCLG should publish clear information about its revisions policy for *Traveller Caravan Count* in the statistical report<sup>39</sup> (Requirement 7).

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<sup>38</sup> In relation to Principle 2, Practice 3; Principle 4 Practice 6; Principle 5 Practice 4; and Principle 8 Practice 3 of the *Code of Practice*

<sup>39</sup> In relation to Principle 2, Practice 6 of the *Code of Practice*

## Annex 1: Summary of assessment process

A1.1 This assessment was conducted from June to November 2015.

A1.2 The Assessment team – Donna Livesey, Jo Mulligan and Oliver Fox-Tatum – agreed the scope of and timetable for this assessment with representatives of DCLG in June. The Written Evidence for Assessment was provided on 20 August 2015. The Assessment team subsequently met DCLG 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

A1.3 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.

A1.4 The Assessment team spoke directly with 10 users. In addition, the Assessment team received 11 email responses from the user consultation. Some of the users that we spoke with in LAs also supply data for the Traveller Caravan Count. The respondents were grouped as follows:

Local government (including a membership organisation)	11
Organisations working with or on behalf of Travellers	8
Central government	1
ONS	1

### Key documents

- Written Evidence for Assessment documents completed by DCLG – organisational evidence and output evidence
- [Traveller Caravan Count, January 2015 and July 2014](#)
- Minutes of Assessment team meetings with users and data suppliers, and email responses

## **Annex 2: Glossary of terms**

### **Travellers:**

Sites and encampments are included in *Traveller Caravan Count* if the occupants live in caravans or other moveable dwellings and are:

- Traditional and Ethnic Gypsies and Travellers or
- Members of the non-traditional New Traveller groups

DCLG advises LAs to exercise their own discretion in deciding whether occupants of particular caravans in their area fall within these definitions.

### **Caravans:**

DCLG advises LAs that the Count should include:

- All mobile homes, caravans, trailers and other living vehicles on Traveller sites and encampments, whether or not they meet the strict legal definition of a caravan
- Touring caravans on Traveller sites and encampments even if not lived in permanently
- Tents, benders or yurts where these are the 'permanent' living accommodation of Travellers

### **Authorised socially rented sites:**

Sites operated by LAs or private Registered Providers (RPs) of social housing (formerly known as Registered Social Landlords) to accommodate Travellers. Any LA sites leased to, or managed by, a non-local authority body or individual (except where they are acting as a private RP) under arrangements which do not give the LA detailed control of the site are regarded as Privately Funded sites.

### **Authorised Privately Funded sites:**

Sites that are on land owned by Travellers, and which have been granted permanent planning permission, or which have been granted planning permission on a temporary basis which is still current on the day of the count. Privately funded sites also include sites owned by any other private individual or body with planning permission for use as a Traveller site.

### **Unauthorised Developments:**

Sites that are on land owned by Travellers and which have not been granted permanent or temporary planning permission.

### **Unauthorised Encampments:**

Sites that are on land not owned by Travellers and which have not been granted planning permission. The land may be in public or private ownership, including the highway.

