



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

## **Statistics from the Northern Ireland House Condition Survey**

*(produced by the Northern Ireland Housing Executive)*

## **Office for Statistics Regulation**

We provide independent regulation of all official statistics produced in the UK. Statistics are an essential public asset. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards they must meet in the *Code of Practice for Official Statistics*. We ensure that producers of government statistics uphold these standards by conducting assessments against the *Code*. Those which meet the standards are given National Statistics status, indicating that they meet the highest standards of trustworthiness, quality and value. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.

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## Executive Summary

### Subject of the assessment

- ES.1 This report is prepared under the provisions of the *Statistics and Registration Service Act 2007*<sup>1</sup>. The Act allows an appropriate authority<sup>2</sup> to request an assessment of official statistics against the *Code of Practice for Official Statistics*<sup>3</sup> in order for them to gain National Statistics status. This report is in response to such a request.
- ES.2 The Northern Ireland Housing Executive (NIHE) publishes statistics on house conditions based on the Northern Ireland House Condition Survey (NIHCS), and through access to data. After each survey, two reports are published, in 2011 these reports were named:
- *Northern Ireland House Condition Survey – preliminary findings (NIHCS preliminary)*<sup>4</sup>
  - *Northern Ireland House Condition Survey – main report (NIHCS main)*<sup>5</sup>
- In 2011 NIHE published a one-off report, making use of 2011 Census data: *Northern Ireland House Condition Survey – district council figures for key measures (modelled)*<sup>6</sup>. This report will not be published in 2016.
- ES.3 The NIHCS is run at least every five years, and this Assessment has taken place ahead of the publication of the results from the 2016 survey. We, the regulatory team, have considered *NIHCS preliminary* and *NIHCS main*, alongside information provided by the NIHE statistics team in relation to the 2016 reports, to inform our judgment.
- ES.4 NIHE published *NIHCS preliminary*, containing statistics on the dwelling stock and unfitness of dwellings at a national level, before publishing the more-detailed main report. *NIHCS main* presents further statistics relating to the dwelling stock, household profiles, fitness standards, state of repair, decent home standard, fuel poverty, housing health and safety rating system, and energy efficiency.

### Public Value Statement

- ES.5 The NIHCS meets the NIHE's statutory responsibility to regularly examine house conditions and need. House conditions are also an important policy concern, within the UK and internationally, with the quality of housing affecting health and the wider well-being of the population. The energy efficiency of residential properties has also been linked to environmental sustainability; Northern Ireland has committed<sup>7</sup> to reducing carbon emissions by 35 per cent

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<sup>1</sup> [www.opsi.gov.uk/Acts/acts2007/pdf/ukpga\\_20070018\\_en.pdf](http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf)

<sup>2</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>3</sup> [www.statisticsauthority.gov.uk/monitoring-and-assessment/code-of-practice/](http://www.statisticsauthority.gov.uk/monitoring-and-assessment/code-of-practice/)

<sup>4</sup> [www.nihe.gov.uk/2011\\_house\\_condition\\_survey\\_preliminary\\_findings\\_published\\_may\\_2012\\_.pdf](http://www.nihe.gov.uk/2011_house_condition_survey_preliminary_findings_published_may_2012_.pdf)

<sup>5</sup> [www.nihe.gov.uk/northern\\_ireland\\_house\\_condition\\_survey\\_main\\_report\\_2011.pdf](http://www.nihe.gov.uk/northern_ireland_house_condition_survey_main_report_2011.pdf)

<sup>6</sup> [www.nihe.gov.uk/2011\\_house\\_condition\\_survey\\_district\\_council\\_figures.pdf](http://www.nihe.gov.uk/2011_house_condition_survey_district_council_figures.pdf)

<sup>7</sup> [www.theccc.org.uk/northern-ireland/](http://www.theccc.org.uk/northern-ireland/)

from 1990 levels by 2025, which is consistent with the UK Government's international commitments. From this Assessment it is clear that house condition statistics are of relevance and importance to a variety of users, including government departments, and they are widely used to inform government policy, and funding allocations. They are a valuable resource in creating a picture of the housing stock in Northern Ireland, and the conditions that people live in.

## **Decision on National Statistics Status**

- ES.6 National Statistics (NS) status means that official statistics meet the highest standards of trustworthiness, quality and public value and comply with all aspects of the Code of Practice for Official Statistics. National Statistics status is awarded by the UK Statistics Authority (The Authority) on the advice of the Office for Statistics Regulation. The Office for Statistics Regulation undertakes an assessment which considers whether the statistics meet the required standard.
- ES.7 The Office for Statistics Regulation judges that NS designation for the two *Northern Ireland House Condition Survey* reports should be granted once NIHE has demonstrated to us that it has enhanced the value, quality and trustworthiness of these statistics in the ways described in chapters one to three of this report. NIHE is expected to report back to the Office for Statistics Regulation by 31 March 2017 whereupon the Authority will decide whether to confer NS designation based on the advice of the Office for Statistics Regulation. NIHE should provide sufficient evidence on all requirements before the publication of both 2016 NIHCS reports to assure the regulatory team that the statistics will be fully compliant with the *Code of Practice*.
- ES.8 Reflecting the importance of NS designation, and to provide users with confidence in the direction of travel, the Office for Statistics Regulation expects NIHE to publish its plan of proposed actions to increase public value, quality and trustworthiness as a result of this Assessment.

## **Strategic Perspective**

- ES.9 The NIHCS statistical reports published by NIHE provide a detailed picture of housing conditions in Northern Ireland. It is clear that these statistics are an essential public asset, providing needed and relevant information on house conditions in Northern Ireland. In the context of housing being a devolved matter, NIHE has made considerable efforts to promote comparability across the UK countries – these efforts are welcomed by the Office for Statistics Regulation.

## **Key findings**

### **PUBLIC VALUE**

- ES.10 The statistics team actively engages with users of the statistics (for example, policy makers within NIHE and the Department for Communities) and demonstrated to us that it has an excellent understanding of what key users need from the NIHCS. The NIHCS reports are comprehensive and the

commentary adds context to the statistics to increase the value to users. However, to enhance the value of the NIHCS reports the statistics team should ensure that the strengths and limitations of the NIHCS statistics in relation to use are brought together to make them easy to find and interpret. To increase the accessibility of the statistics the tables should be published in a more open format.

## QUALITY

ES.11 NIHE uses sound methods to collect and analyse the NIHCS data. Broad information regarding quality and methodology is provided. However, the level of detailed information varies across and within the NIHCS reports. For example, there is detailed information provided for the Northern Ireland Fuel Poverty model, including a helpful schematic diagram (in Appendix F of *NIHCS main*). However, there is little detail on what the weighting and grossing process entails. Furthermore, there is some detail about quality assurance within *NIHCS main*, but none in *NIHCS preliminary*. Providing detailed, consistent, and coherent quality and methodology information will enhance users' understanding of the NIHCS statistics.

## TRUSTWORTHINESS

ES.12 Although the regulatory team is assured that the NIHCS statistics are trustworthy, there are a number of steps that NIHE needs to take to publicly demonstrate this trustworthiness.

ES.13 Prior to this Assessment, the NIHE board, which includes members of political parties, has had sight of key headline statistics from the NIHCS several months before publication. It is essential that as part of any National Statistics designation, there is no public perception of political interference in the statistics. The statistics team told us that in future no one, including the NIHE board, will receive pre-release access to any of the NIHCS statistics unless it is for quality assurance purposes only.

ES.14 During this Assessment NIHE has produced a number of documents to demonstrate the transparency and trustworthiness of the NIHCS statistics. These include a Pre-Release Compliance Statement, Confidentiality Statement, and a Revisions Policy. We are encouraged by the steps that the statistics team has already taken to make improvements to these statistics, and look forward to their publication.

ES.15 The NIHCS statistical reports are not currently released in line with release practices laid out in the Code. To ensure that they are released into the public domain in an orderly manner that promotes public confidence and gives equal access to all users they should be published at 9:30am, according to a published timetable.

# Chapter 1: Public value

## Context

- 1.1 House conditions are an important policy concern within the UK and internationally, with the quality of housing affecting health and the wider well-being of the population. The energy efficiency of residential properties has also been linked to environmental sustainability; Northern Ireland has committed<sup>8</sup> to reducing carbon emissions by 35% from 1990 levels by 2025, which is consistent with the UK Government's international commitments.
- 1.2 Legislative responsibility for housing policy in the UK has been a devolved matter since 1998. The Department for Communities (DfC) is responsible for housing policy in Northern Ireland, and the Department for Communities and Local Government (DCLG) in England, the Scottish Government in Scotland and the Welsh Government in Wales. These policies differ by administration, as inevitably, do the statistics that feed into them.
- 1.3 The NIHCS statistics are used to monitor two standards that the housing stock in Northern Ireland is required to meet: the Housing Fitness Standard, which has been in place in its current form since 1992<sup>9</sup>; and, since 2004, the Decent Homes Standard<sup>10</sup>. This monitoring allows NIHE to target its spending on improving house conditions in Northern Ireland. Furthermore, as *NIHCS main* states, the NIHCS statistics and data make an important contribution to government strategies, such as Regional Development, Fuel Poverty, Empty Homes, and the Private Rented Sector strategies.

## Users' Perspective

- 1.4 As part of this Assessment, we asked for views about the NIHCS statistics from a variety of users (researchers, councils, and government departments; see Annex 2 for details of the engagement process). Those who responded were very positive about their engagement with the NIHE statistics team, and the NIHCS statistics publications. More information on what the users use NIHCS statistics for is provided in Annex 2. In general, users were satisfied with the presentation, accessibility, coverage, data collection method, and analysis of data of the NIHCS reports. All respondents commented on how important the NIHCS data and analysis are for their work and interests. Most users told us that a larger sample and more frequent survey would increase the value of NIHCS in terms of, for example, being able to provide more localised house condition estimates or data breakdowns for minority populations, as well as having more timely up-to-date information. However, users also recognised the financial constraints of the survey and felt that the statistics team's engagement with users allowed them to make good use of the resources available to them in order to maximise value for users. The regulatory team saw the user understanding of the constraints that the statistics team faces as a testament to effective user engagement.

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<sup>8</sup> [www.theccc.org.uk/northern-ireland/](http://www.theccc.org.uk/northern-ireland/)

<sup>9</sup> [www.communities-ni.gov.uk/topics/housing/housing-fitness-standard](http://www.communities-ni.gov.uk/topics/housing/housing-fitness-standard)

<sup>10</sup> [www.communities-ni.gov.uk/decent-homes-standard](http://www.communities-ni.gov.uk/decent-homes-standard)

## Findings

- 1.5 NIHE's primary user engagement activity<sup>11</sup> is through a user engagement group, which meets quarterly to share information on the NIHCS, such as plans for dissemination of the analysis. Currently the user group is attended by users who NIHE already knows of. NIHE could do more to add value to its statistics by creating stronger engagement links with a wider range of housing statistics users beyond the identified groups. By doing this, NIHE can uncover and prioritise unmet demand for house condition statistics.
- 1.6 NIHE has set up a House Condition Survey Steering Group<sup>12</sup>, comprising various government analysts, which provides guidance in terms of survey design and methodology, as well as agreeing the chosen research design and associated costing for approval. NIHE might consider inviting expertise outside of government to gain different perspective and advice.
- 1.7 The NIHCS statistical reports offer a comprehensive and coherent picture of housing conditions in Northern Ireland. However, more information could be provided on strengths and limitation of the NIHCS statistics in relation to use. Some information can already be found in *NIHCS main* but this information is not clearly labelled or easy to find in such a large publication. Furthermore, there is missing information on some limitations of the methods used, and the steps that NIHE takes to accommodate these limitations. For example, respondents to surveys often might not respond accurately, or at all, to questions about sensitive topics such as income. When estimating income the statistics team take into account this limitation through modelling work with data from the Family Resources Survey. However, neither this limitation nor the work done to account for it is mentioned in the NIHCS reports. The regulatory team also noted that there was little mention of strengths and limitations in relation to use in *NIHCS preliminary*. Explaining the strengths and limitations of the statistics will aid users understanding of the level of uncertainty in the statistics, and will help inform what analyses can and cannot be supported by them.
- 1.8 Tables and charts presented in the NIHCS statistical reports are published only in PDF format, inhibiting easy re-use of the analysis published by NIHE. Publication of these tables and charts in a more open format could encourage more use of the data, both by current users and potential new users. For example, users could carry out further analysis using the NIHCS statistics to create tables that better meet their needs, or they could re-use the tables in their own reports.
- 1.9 A key objective of the NIHCS is 'to facilitate a comparative analysis of housing conditions in Northern Ireland with other parts of the UK'. The regulatory team welcomes this approach as it enables those users who want to focus on the UK as a whole, despite housing being a devolved matter, to gain a coherent picture of housing conditions. An example of NIHE meeting this objective is when the Housing Health and Safety Rating System (HHSRS) replaced the Fitness Standard in England in 2006 – a change which has not been

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<sup>11</sup> [www.nihe.gov.uk/index/corporate/housing\\_research/house\\_condition\\_survey/corporate-user-engagement.htm](http://www.nihe.gov.uk/index/corporate/housing_research/house_condition_survey/corporate-user-engagement.htm)

<sup>12</sup> [www.nihe.gov.uk/index/corporate/housing\\_research/house\\_condition\\_survey/corporate-steering-group.htm](http://www.nihe.gov.uk/index/corporate/housing_research/house_condition_survey/corporate-steering-group.htm)

implemented in Northern Ireland – NIHE produced HHSRS statistics for Northern Ireland as well to ensure comparisons with England could continue to be made.

- 1.10 The statistics team is able to save time and money by learning from the developments in the survey questions and methodology that the English Housing Survey statistics team at DCLG undertakes. Following the changes made in the England Housing Survey and implementing them in the NIHCS also allows NIHE to keep to the survey’s objective of comparability between other UK nations. NIHE then adds in questions that relate to its own users’ needs, such as understanding problems in the local area like sectarian graffiti.
- 1.11 In 2014/15 NIHE commissioned the Stock Condition Survey<sup>13</sup>, which measured house conditions of the NIHE housing stock to assess the current and future repair and maintenance liabilities. Some of the statistics produced from the Stock Condition Survey are similar to those produced in the NIHCS, for example, fitness standard and decent home standard statistics. The Stock Condition Survey was a one-off survey carried out by an external chartered surveyors company, Savills Plc, using a different methodology and focussing on NIHE housing stock only. The statistics from the NIHCS and the Stock Condition Survey are therefore not necessarily comparable. During this Assessment, the statistics team added some information about the Stock Condition Survey to the House Condition Survey section of its website<sup>14</sup> to help navigate users to the correct survey. However, we suggest that more detail should be added to the website to ensure users understand the differences in methodology, potential uses and interpretation between the two surveys.
- 1.12 In 2011 NIHE published a one-off report, making use of 2011 Census data, titled: ‘Northern Ireland House Condition Survey – district council figures for key measures (modelled)’<sup>15</sup>, this report will not be published in 2016. The statistics team needs to wait until the 2016 survey data is delivered by BRE before it can assess if and what statistics will be published at district council level. As these statistics are important for users the statistics team needs to ensure that users understand the plans for district council-level statistics and explore ways to meet users’ needs where possible.
- 1.13 During this Assessment, the statistics team made several improvements to its website and supporting information to aid users and increase the value of these statistics. We recognise NIHE’s responsive action to address these issues identified during the Assessment process and welcome the improvements made.

**Table 1: Value detailed findings and requirements**

Finding	Examples	Requirement	
Strengths and limitations in relation	<ul style="list-style-type: none"> <li>NIHCS main does not explain in any detail</li> </ul>	1	To enhance the public value of these statistics by

<sup>13</sup> [www.nihe.gov.uk/main\\_stock\\_condition\\_survey\\_report.pdf](http://www.nihe.gov.uk/main_stock_condition_survey_report.pdf)

<sup>14</sup> [www.nihe.gov.uk/index/corporate/housing\\_research/house\\_condition\\_survey.htm](http://www.nihe.gov.uk/index/corporate/housing_research/house_condition_survey.htm)

<sup>15</sup> [www.nihe.gov.uk/2011\\_house\\_condition\\_survey\\_district\\_council\\_figures.pdf](http://www.nihe.gov.uk/2011_house_condition_survey_district_council_figures.pdf)

<p>to use are not comprehensive and are not presented clearly enough for some of the identified users.</p>	<p>how the small sample size may impact on use and interpretation of the statistics.</p> <ul style="list-style-type: none"> <li>• <i>NIHCS preliminary</i> does not contain comprehensive information on strengths and limitations of the data, such as asking for details on income.</li> </ul>		<p>increasing users understanding of the quality, NIHE should ensure that published details of the strengths and limitations of the statistics are comprehensive, and are easy to find and understand in all published outputs.</p>
<p>Statistics are published only in PDF tables and are not available in an open format.</p>	<ul style="list-style-type: none"> <li>• The statistical annex document containing a range of tables on the NIHCS is published in PDF format only.</li> </ul>	<p><b>2</b></p>	<p>To enhance accessibility and maximise potential use of the NIHCS data, NIHE should provide data tables in an open format.</p>

## Chapter 2: Quality

### Context

- 2.1 Statistical quality is multi-faceted. The European Statistical System (ESS) identifies five aspects of quality: 'relevance', 'accuracy and reliability', 'timeliness and punctuality', 'coherence and comparability' and 'accessibility and clarity'. The focus is often on 'accuracy and reliability'. The need for statistics to be relevant, accurate and reliable means, in essence, that we are confident that the patterns shown by the statistics reflect real-world phenomena, and are not artefacts of the way that the statistics have been assembled. But these factors also need to take into consideration that without being accessible or timely, statistics fail to add as much public value as they might otherwise.

### Findings

#### *Methodology*

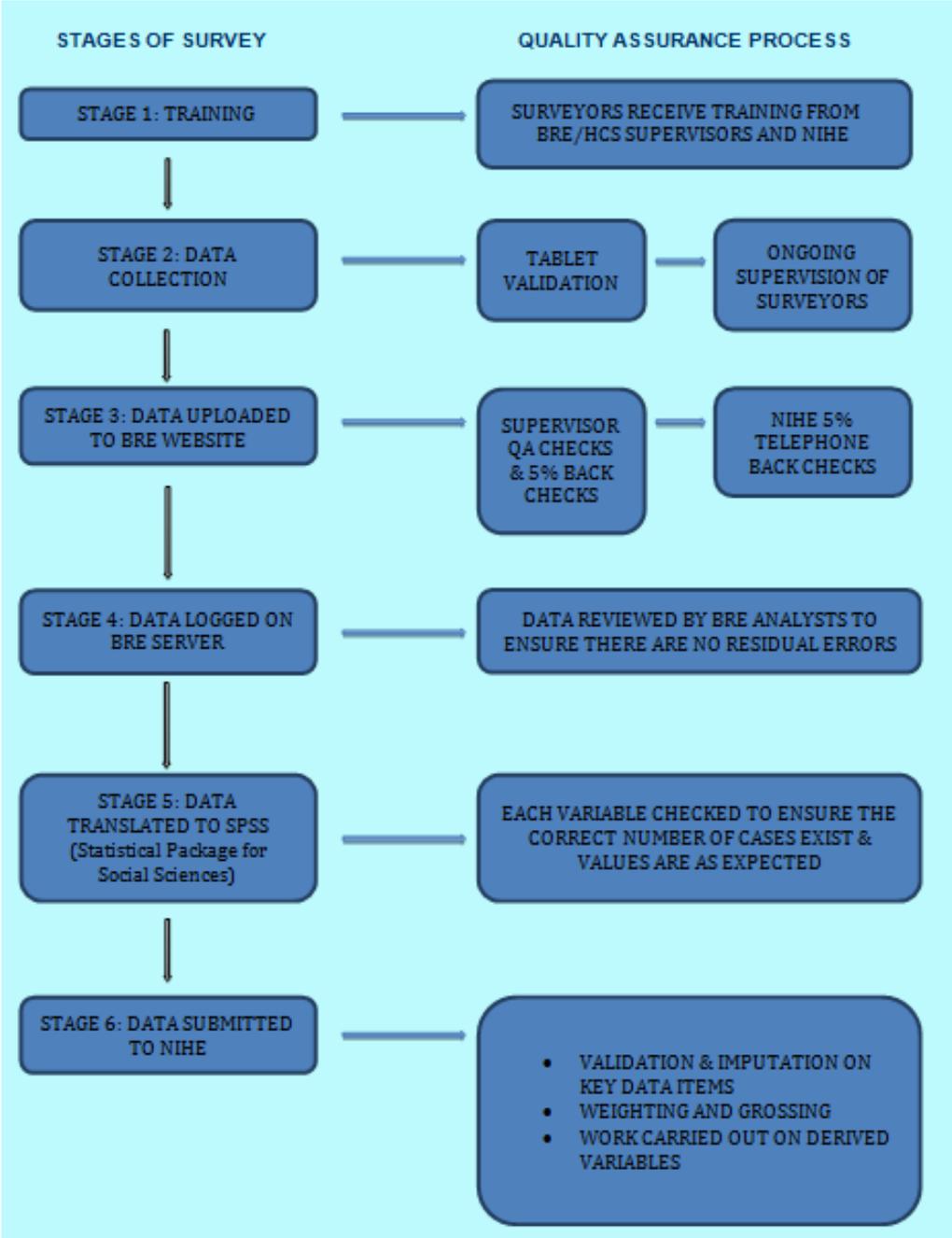
- 2.2 NIHE uses sound methods to collect and analyse the NIHCS data. The statistics team works in partnership with BRE, which provides methodological expertise to both Northern Ireland and England. For instance, BRE, on behalf of NIHE, has developed models of estimating the energy efficiency of the housing stock in Northern Ireland adapting the Government's Standard Assessment Procedure (SAP) to take into account the greater prevalence of solid fuel and electrical heating compared to England. The regulatory team noted that NIHE considers carefully the methodology used. For example, when faced with budget constraints the statistics team explored different options in terms of sample size, and with support from the steering group, recommended to the NIHE board the best option to produce robust results.
- 2.3 *NIHCS main* includes some information on the methodology of the survey, a copy of the survey questionnaire, sample design, weighting and grossing, sampling errors, and a glossary of key definitions. In *NIHCS main* some information on how house condition estimates are derived is included; however, the level of detail varies by the variable in question. For example, detailed information is provided for the Northern Ireland Fuel Poverty model, including a helpful schematic diagram (in Appendix F of *NIHCS main*). However, there is little detail on what the weighting and grossing process entails. Furthermore, *NIHCS preliminary* does not include information on methodology. There is limited information on how the suite of NIHCS statistics meets the five aspects of quality identified by the ESS.
- 2.4 BRE told us that the statistics team had worked on the NIHCS for a substantial number of years and had built up a good knowledge base. In order to mitigate against the risk of loss of expertise and knowledge in the team should a core member of staff leave, a system should be put in place to capture the knowledge of team members to ensure that quality is maintained as staff move on.
- 2.5 Information provided on the NIHE website is sometimes out of date; this has the potential to confuse users. For example, a methodology section of the website contained sampling information for the 2009 NIHCS, but no

information on the sampling for the subsequent survey in 2011. During this assessment NIHE removed the methodology section from its website.

### *Quality assurance*

- 2.6 The regulatory team is confident that the statistics team has implemented a thorough quality assurance process of the survey data. The NIHCS goes through several stages – planning, fieldwork, data collection, data validation, and data analysis. At each stage a set of procedures and checks are carried out to ensure the quality of the data (see figure 2). For example, during the fieldwork stage:
- Extensive training and guidance is given to the surveyors, both on how to carry out the survey to gain accurate information, and on any issues regarding data collection
  - Surveyors use tablets to collect the data, where there are in-built validation checks, prompting surveyors to correct errors (such as highlighting potential inconsistencies within the form) as the data are collected. This reduces human errors in terms of data collection and entry into the system when compared to pen and paper data collection.
  - Supervisors revisit 5 per cent of houses surveyed, and NIHE telephone 5 per cent of households surveyed to check for consistency with the returned survey form.
- 2.7 *NIHCS main* mentions a number of the quality assurance processes carried out during the fieldwork stage of the survey. However, there is little detail provided about some of these processes to allow users to understand what validation and consistency checks are made, both at this stage and throughout the data collection and analysis of NIHCS. This is particularly the case for the quality assurance that is carried out by NIHE after the fieldwork stage of the survey. During this Assessment, NIHE produced a Quality Assurance Process document, which highlights the quality assurance that is carried out at each stage of the survey. NIHE told us that it plans to publish this document before the next set of NIHCS statistics is released.

**Figure 2: Quality assurance process chart**



Source: NIHE Quality Assurance guidance (not yet published)

**Table 2: Quality Detailed Findings and Requirements**

Finding	Examples	Requirement
Across the NIHCS reports and on the website there is not enough detailed up-to-date information	<ul style="list-style-type: none"> <li>Quality assurance process is broadly outlined throughout the field work stage, but lacks detail relating to</li> </ul>	<b>3</b> In order to enhance users understanding of the quality of the statistics, NIHE should review and

<p>published on:</p> <ol style="list-style-type: none"> <li>1. Quality assurance</li> <li>2. The five aspects of quality identified by the ESS</li> <li>3. Methodology used to derive house condition estimates</li> <li>4. Definitions (<i>NIHCS preliminary</i>)</li> </ol>	<p>the analysis and publication stage.</p> <ul style="list-style-type: none"> <li>• Detail about the weighting and grossing process is not clear.</li> </ul>	<p>improve the reporting of quality and methodology information in all NIHCS reports to ensure appropriate information is available to users. This should include publishing:</p> <ol style="list-style-type: none"> <li>a) more-detailed information on the methodology used to produce the statistics, written in a clear and understandable way for non-technical users</li> <li>b) information on the ESS's five aspects of quality</li> <li>c) comprehensive information on NIHCS statistics quality assurance procedures for each stage of the data journey</li> <li>d) up-to-date information on the survey methodology</li> </ol>
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## Chapter 3: Trustworthiness

### Findings

- 3.1 The NIHE board, which is attended by members of political parties, currently has sight of headline statistics from the NIHCS before publication. The key findings are shared with the board around 3 months before *NIHCS preliminary* is published, and a year before *NIHCS main* is published. NIHE told us that this pre-release access is provided for information purposes only, not for quality assurance, and no changes have ever been made to the statistics based on the board's comments. During this assessment NIHE told us that it plans to stop providing this pre-release access to the board in order to reduce any perception of political interference in the statistics. This was discussed at the user engagement group in July 2016, where the published minutes<sup>16</sup> also state that 'in accordance with the Code of Practice for Official Statistics it would not be possible for senior managers in NIHE to see statistics prior to the release date. It was noted, however, that where managers were part of the quality assurance process it would be possible to show them the statistics in confidence'. We welcome this important step to enhance the trustworthiness of NIHCS statistics.
- 3.2 The team that runs the NIHCS and produces the NIHCS statistics is the only statistics team within NIHE. The team's statistical Head of Profession (HoP) is the Chief Executive of NIHE. He is responsible for ensuring that those involved in the production of the statistics are protected from any political pressures that might arise. The HoP at NIHE is not a statistician. However, the team receives statistical support from a senior statistician at DfC. The team also has strong links with Northern Ireland Statistics and Research Agency (NISRA), from which it receives updates on statistical issues such as training, and additional statistical support when required. The NIHCS statistics are used to inform a number of key government strategies, including the Housing Growth Indicators<sup>17</sup> in the Regional Development Strategy, Fuel Poverty Strategy<sup>18</sup>, Empty Homes Strategy<sup>19</sup>, and analysis of the impact of the ongoing welfare reforms. The statistics team told us that to ensure that the integrity of NIHCS data is not compromised, they are not shared with any users, with the exception of the key findings that are shared with the NIHE board (see paragraph 3.1), until after publication. In addition, the surveyors who carry out the survey are trained off-site and are therefore not in contact with any staff at NIHE apart from the statistics team. Also, the NIHCS statistics used to measure progress against the government strategies are mostly those produced by the external contractor BRE. The statistics team told us that the statistics have not been influenced by external pressures, and if there was any pressure to manipulate data or change key points in published reports they would take the request to the NIHCS steering group, which is attended by numerous government statisticians. However, there is no documentation on how those who produce the statistics are protected from any pressures that

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<sup>16</sup> [www.nihe.gov.uk/hcs\\_user\\_engagement\\_minutes\\_july\\_2016.pdf](http://www.nihe.gov.uk/hcs_user_engagement_minutes_july_2016.pdf)

<sup>17</sup> [www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/2012-based-housing-growth-indicators-hgis-and-methodology-paper.pdf.pdf](http://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/2012-based-housing-growth-indicators-hgis-and-methodology-paper.pdf.pdf)

<sup>18</sup> [www.communities-ni.gov.uk/publications/fuel-poverty-strategy](http://www.communities-ni.gov.uk/publications/fuel-poverty-strategy)

<sup>19</sup> [www.communities-ni.gov.uk/sites/default/files/publications/dsd/empty-homes-strategy-action-plan-2013-18.pdf](http://www.communities-ni.gov.uk/sites/default/files/publications/dsd/empty-homes-strategy-action-plan-2013-18.pdf)

might influence the methods, content or timing of the outputs on NIHCS statistics.

- 3.3 During this assessment, NIHE has produced a Pre-Release Compliance Statement, which sets out what arrangements will be in place for giving Ministers and their briefing officials' pre-release access to official statistics once they are in their final form prior to publication. It has also produced a Revisions Policy, which describes how both planned and unplanned revisions will be dealt with. With regards to minor errors, the policy says that the Statistics team will 'insert the necessary changes without alerting anyone'. This could confuse users who have previously referred to these statistics, which may undermine trust. NIHE told us that if minor errors occur in future it will include a correction note on its website. It will consider changing this aspect of the Revisions Policy. NIHE plans to publish both of these documents on its website shortly, which will enhance public trust in these statistics. NIHE also plans to publish lists of those people given restricted pre-release access to each of the NIHCS statistical reports when they are published.
- 3.4 NIHE has a range of procedures in place to protect the confidentiality of the data. For example, the statistics team and the surveyors who carry out the surveys receive training on their obligations with regards to confidentiality, and have signed a Declaration of Confidentiality in Official Statistics. NIHE has published Data Protection Guidance for Handling Personal Information<sup>20</sup>, and during this assessment, has also produced a Confidentiality Statement, which highlights physical, technical and operational security arrangements that are in place. NIHE plans to publish the Confidentiality Statement on its website shortly. We suggest that when this is published it contains a link to the Data Protection Guidance for Handling Personal Information, which is currently not signposted from the NIHCS section of the NIHE website and is not easy to navigate to.
- 3.5 Each of the NIHCS statistical reports is written impartially and objectively, and users told us that they believe them to be reliable sources of information. However, the Foreword of *NIHCS main* is written by the Chairman and Chief Executive of NIHE, and contains statements which could be considered to be political in nature. For example *NIHCS main 2011*<sup>21</sup> states that the government investment in energy efficiency measures 'is reflected in the proportion of dwellings failing the Decent Homes Standard falling' and 'has also had a positive impact on tackling fuel poverty in Northern Ireland'. Although this provides a useful context for the statistics, any statements from those outside the statistics team should be published separately, to avoid any concerns about the integrity of the production process. We suggest that the Foreword in *NIHCS main* be a statistical Foreword, with any political statement published separately. Alternatively, if the Foreword is to be written by the Chief Executive and Chairman, it should not contain any wording that is political in nature.
- 3.6 The NIHCS statistical reports are not published in line with release practices laid out in the Code. The reports:

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<sup>20</sup> [www.nihe.gov.uk/handling\\_personal\\_information](http://www.nihe.gov.uk/handling_personal_information)

<sup>21</sup> See footnote 1

- Are not listed in a 12-month publication plan on the NIHE website or on the Statistics Release Calendar on GOV.UK<sup>22</sup>
- Are not routinely published at 9:30am
- Do not include the name or contact details of the lead statistician responsible for the NIHCS statistics

These practices should be met to ensure that statistical reports are released into the public domain in an orderly manner that promotes public confidence and gives equal access to all users.

- 3.7 The statistics team responds to ad hoc requests for NIHCS statistics where users are unable to access the data required from the published reports. The responses to these requests are sent directly to the customer who requested it only; they are not published on the NIHE website. To enhance transparency and encourage re-use of data, we suggest that NIHE publishes the ad hoc releases as supplementary tables, or publishes a list of the ad hoc tables that are available on request.

**Table 3: Trustworthiness Detailed Findings and Requirements**

Finding	Examples	Requirement
There are no procedures in place to prevent pre-release access to the NIHCS statistics. As a result, key findings are shared with the NIHE board several months before the NIHCS statistics are published.	<ul style="list-style-type: none"> <li>• Members of the NIHE board currently receive sight of key findings from the NIHCS several months before publication, for information only.</li> <li>• There is no published list to indicate who has had pre-release access to the NIHCS statistics.</li> <li>• There is no published documentation of pre-release access arrangements.</li> </ul>	<p><b>4</b> To demonstrate the trustworthiness of these statistics NIHE should:</p> <ul style="list-style-type: none"> <li>a) ensure pre-release access to each of the NIHCS statistical reports is restricted to those people essential for production and publication, or for quality assurance and operational purposes;</li> <li>b) publish lists of those people given restricted pre-release access to each of the NIHCS statistical reports</li> <li>c) publish the Pre-Release Compliance statement, which outlines arrangements in place for pre-release access</li> </ul>
There are currently no official	<ul style="list-style-type: none"> <li>• There are no procedures in place to support statisticians working at NIHE in the event</li> </ul>	<p><b>5</b> To demonstrate its trustworthiness, NIHE should:</p>

<sup>22</sup> [www.gov.uk/government/statistics](http://www.gov.uk/government/statistics)

<p>procedures in place to protect the statistics team from any political pressures.</p> <p>There is currently no published documentation on how NIHE treats revisions and corrections to data, or how it protects confidentiality of the NIHCS data.</p>	<p>of being faced with political pressures</p> <ul style="list-style-type: none"> <li>• There is no revisions policy or confidentiality statement published.</li> </ul>	<ul style="list-style-type: none"> <li>a) Set out documentation on how those who produce the statistics are protected from any pressures that might influence the methods, content or timing of the outputs on NIHCS statistics.</li> <li>b) Publish documentation on how it ensures the integrity of official statistics, for example, its revisions policy and confidentiality statement.</li> </ul>
<p>The NIHCS statistical reports are not released in line with release practices laid out in the Code.</p>	<ul style="list-style-type: none"> <li>• The reports are currently not published at 9.30am.</li> <li>• There is no published timetable indicating when the statistical reports will be published, either on the NIHE website or on the GOV.UK release calendar.</li> <li>• Contact details on the statistical reports are for a policy member of staff, not the responsible statistician.</li> </ul>	<p><b>6</b></p> <p>To ensure that statistical reports are released into the public domain in an orderly manner that promotes trustworthiness and public confidence, and gives equal access to all users, NIHE should:</p> <ul style="list-style-type: none"> <li>a) Publish a timetable of releases for these statistics 12 months in advance and ensure that these statistics can be accessed from the Statistics Release Calendar.</li> <li>b) Ensure that NIHCS statistics are issued at 9.30am on the day of release.</li> <li>c) Publish the name and contact details of the responsible statistician in the statistical reports.</li> </ul>

## Annex 1: About the statistics

### The Statistics

A1.1 The Northern Ireland Housing Executive (NIHE) publishes statistics on house conditions based on the Northern Ireland House Condition Survey (NIHCS), and through access to data. The first survey was conducted in 1974, and has occurred at least every 5 years since. After each survey two reports are published. In 2011 these reports were named:

- *Northern Ireland House Condition Survey – preliminary findings (NIHCS preliminary)*<sup>23</sup>
- *Northern Ireland House Condition Survey – main report (NIHCS main)*<sup>24</sup>

In 2011, NIHE published a one-off report, making use of 2011 Census data, titled: '*Northern Ireland House Condition Survey – district council figures for key measures (modelled)*'<sup>25</sup>. This report will not be published in 2016.

A1.2 NIHE publishes *NIHCS preliminary*, relating to the dwelling stock and unfitness of dwellings, at a national level before publishing the more detailed main report around nine months later. *NIHCS main* presents further statistics relating to dwelling stock, household profiles, fitness standards, state of repair, decent home standard, fuel poverty, housing health and safety rating system, and energy efficiency.

A1.3 The key objectives of the NIHCS in 2016 statistics are to:

- Provide a comprehensive picture of the dwelling stock and its condition in 2016 for Northern Ireland and each of the 11 new district councils: Belfast will be divided into four, giving a total of 14 areas
- Facilitate a comparative analysis of housing conditions in Northern Ireland with other parts of the UK
- Examine the association between dwelling conditions and the social and economic circumstances of households
- Examine changes in the condition of the stock over time in terms of key Government measures: Decent Homes Standard and the Housing Health and Safety Rating System
- Provide a reliable assessment of the energy efficiency of the stock and the level of Fuel Poverty in Northern Ireland on a comparable basis with the rest of the UK

The objectives have remained broadly consistent with those in 2001, 2004, 2006, 2009 and 2016.

A1.4 The statistics team provides NIHCS data and further analysis upon request to internal and external users. The statistics team does not normally charge for ad hoc requests, unless requested by a private company or the time and resources required to complete the request are substantial. The UK Data

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<sup>23</sup> [www.nihe.gov.uk/2011\\_house\\_condition\\_survey\\_preliminary\\_findings\\_published\\_may\\_2012\\_.pdf](http://www.nihe.gov.uk/2011_house_condition_survey_preliminary_findings_published_may_2012_.pdf)

<sup>24</sup> [www.nihe.gov.uk/northern\\_ireland\\_house\\_condition\\_survey\\_main\\_report\\_2011.pdf](http://www.nihe.gov.uk/northern_ireland_house_condition_survey_main_report_2011.pdf)

<sup>26</sup> [www.nihe.gov.uk/2011\\_house\\_condition\\_survey\\_district\\_council\\_figures.pdf](http://www.nihe.gov.uk/2011_house_condition_survey_district_council_figures.pdf)

Archive holds data from the tenth survey (conducted in 2009) onwards, to ensure micro-data are readily accessible for analysis<sup>26</sup>.

A1.5 House conditions are an important policy concern, within the UK and internationally, with the quality of housing affecting health and the wider well-being of the population. The energy efficiency of residential properties has also been linked to environmental sustainability; Northern Ireland has committed<sup>27</sup> to reducing carbon emissions by 35% on 1990 levels by 2025, which is consistent with the UK Government’s international commitments. Taking energy efficiency statistics as an example (see Figure 3) it is clear that house condition statistics are of relevance to a variety of government departments on a number of different strategies and objectives.

**Figure 3: Energy efficiency in relation to governmental department/agency objectives in Northern Ireland**

<b>Government Department/Agency</b>	<b>Strategy/Objective</b>
Department for Social Development	Housing Fuel poverty
Department for Enterprise, Trade & Investment	Energy strategies Job creation
Department for Health, Social Services & Public Safety	Health & Wellbeing (includes fuel poverty)
Department of Environment	Air Quality Climate Change
Department of Agriculture	Rural Poverty
Office of First Minister & Deputy First Minister	Anti-poverty strategies Sustainable development
Department of Finance & Personnel	Building regulations Energy performance certificates

Source: NIHE “[Energy Efficiency Good Practice Guide for Refurbishment of the Residential Sector \(Low Rise\) 2015](#)”

## Uses and Users

A1.6 The NIHCS statistics are used to monitor two standards that the housing stock in Northern Ireland is required to meet; the Fitness Standard, set out in Schedule 5 of the Housing (Northern Ireland) Order 1992, and since 2004 the Decent Homes Standard, which also applies in England and Wales and the Scottish Housing Quality Standard applies in Scotland. Furthermore, as *NIHCS main* states, the 2011 House Condition Survey has made an important contribution to a number of key government strategies including the Housing Growth Indicators in the Regional Development Strategy, Fuel Poverty, Empty

<sup>26</sup> <https://discover.ukdataservice.ac.uk/Catalogue/?sn=7370&type=Data%20catalogue>

<sup>27</sup> [www.theccc.org.uk/northern-ireland/](http://www.theccc.org.uk/northern-ireland/)

Homes and the Private Rented Sector Strategy and more recently to the analysis of the impact of the ongoing Welfare Reforms’.

A1.7 Those who responded to the regulatory team’s own user consultation told us that they used NIHCS statistics and data for:

- National housing policy and strategic developments, intervention and evaluation. For example, users highlighted to us the importance of NIHCS fuel poverty estimates in terms of monitoring fuel poverty within NI and in comparison with the rest of the UK.
- The policy teams within NIHE use the NIHCS to inform their own work in relation to their strategic responsibilities. The value of statistics relating to energy efficiency, including fuel poverty, was highlighted in our discussion.
- The statistics are used by district councils, where, for example, Fitness levels, Decent Homes Standard, Energy Efficiency and Fuel Poverty estimates are used in baseline reports to help with community planning in the councils. As one user pointed out, these statistics will become increasingly relevant for councils, due to further planning powers granted in 2015. This user also told us that the NIHCS statistics are used by the council’s environmental health officers, in terms of planning workloads, development of policy and strategic direction.
- Outside government, charities and academic institutes use the analysis published by NIHE and the underlying data collected in NIHCS. One charity uses the NIHCS statistics to evaluate government policy, and to gain a deeper understanding of house conditions in rural areas in Northern Ireland. Another user said that the NIHCS statistics were an invaluable resource for teaching environmental health students, as well as using data for research purposes. A different user used NIHCS data to provide analysis on housing inequalities for a report published by the Equality Commission for Northern Ireland<sup>28</sup>.

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<sup>28</sup> [www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/HousingInequalities-FullReport.pdf](http://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/HousingInequalities-FullReport.pdf)

## Annex 2: The source data

### Data Sources and Flows

A2.1 In 2016, a random sample of 3,000 dwellings were selected in two stages:

- A resample element, which will consist of a re-survey of approximately 1,400 properties surveyed in 2011. This will provide a longitudinal analysis of changes in the housing stock, including tenure.
- A fresh sample of approximately 1,600 properties taken from the Pointer<sup>29</sup> database held by NISRA

A2.2 Dwellings are visited by a trained surveyor, who use electronic tablets to collect social survey and physical survey data on:

- The physical attributes of each dwelling (internal and external; physical survey)
- The physical aspects of flats and common areas (physical survey)
- The front and back plot of the dwelling, the local neighbourhood and area (physical survey)
- The Housing Health and Safety Rating System (physical survey)
- Demographic, social economic and attitudinal information on households (social survey)

The information gathered in the physical section allows measurement of repair costs, the Fitness Standard, the Decent Homes Standard, Fuel Poverty, SAP and the HHSRS. Information from the social survey is cross referenced with the physical survey data to provide an indication of the types of households living in dwellings which are in the poorest condition and most likely to fail government standards.

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<sup>29</sup> Pointer is the address database for Northern Ireland and is maintained by Land & Property Services (LPS), with input from local councils and Royal Mail: [www.nidirect.gov.uk/articles/pointer](http://www.nidirect.gov.uk/articles/pointer)

### Annex 3: The Assessment Process

- A3.1 This Assessment was conducted from June to November 2016.
- A3.2 This report was prepared by the Office for Statistics Regulation and approved by the Regulation Committee on behalf of the Board of the UK Statistics Authority, based on the advice of the Director General for Regulation.
- A3.3 The regulatory team – Donna Hosie and Emma Nash – agreed the scope of and timetable for this assessment with representatives of NIHE in June 2016. The documentary evidence was provided in July 2016. The regulatory team subsequently met the statistics team at NIHE during October 2016 to review compliance with the *Code of Practice*, taking account of the all evidence provided and researched.
- A3.4 This is one of a series of reports<sup>30</sup> prepared under the provisions of the *Statistics and Registration Service Act 2007*<sup>31</sup>. The Act gives the Statistics Authority (the Authority) power to re-assess whether the *Code of Practice for Official Statistics*<sup>32</sup> continues to be complied with in relation to official statistics already designated as National Statistics.
- A3.5 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 our 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.
- A3.6 The regulatory team received 7 responses from the user and data supplier consultation. The respondents were grouped as follows:

**Table 3: Summary of respondents to the assessment consultation**

Users	
Researcher/Analyst	2
NIHE	1
Voluntary Sector	1
Devolved Government	1
Local Government	1
Suppliers	
Commercial organisation	1

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<sup>30</sup> [www.statisticsauthority.gov.uk/publications-list/?keyword=&type=assessment-report](http://www.statisticsauthority.gov.uk/publications-list/?keyword=&type=assessment-report)  
<sup>31</sup> [www.opsi.gov.uk/Acts/acts2007/pdf/ukpga\\_20070018\\_en.pdf](http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf)  
<sup>32</sup> [www.statisticsauthority.gov.uk/wp-content/uploads/2015/12/images-codeofpracticeforofficialstatisticsjanuary2009\\_tcm97-25306.pdf](http://www.statisticsauthority.gov.uk/wp-content/uploads/2015/12/images-codeofpracticeforofficialstatisticsjanuary2009_tcm97-25306.pdf)

**Key documents**

NIHE Research Guidance Manual

Other documents provided by NIHE statisticians included the following: Organisation charts, project progress reports, communications strategy, process manuals, service level agreement, recruitment documentation, business plans, risk register, minutes of User Engagement and Steering Group meetings.

## **Annex 4: Responding to the assessment report: what the Office for Statistics Regulation and the producer body should expect from each other**

A4.1 The publication of the Assessment report represents a key milestone in the assessment process, but should not be viewed as the end point. The next phase, to meet the Requirements set out in this report, is critical to delivering the value, quality and trustworthiness to achieve and maintain National Statistics status. The next steps are as follows:

- immediately following the publication of the report, the Office for Statistics Regulation will arrange a meeting with the statistics team to talk through the detail of the Requirements and to ensure a common understanding
- the lead official can follow up with the Assessment Programme Manager about the Director General for Regulation's letter that accompanies this Assessment Report. The letter: draws out the key findings; provides advice about where the statistics team is likely to need senior management support and direction and conveys any findings that have wider implications for the producer body and statistical system
- the lead official is encouraged to:
  - i) develop an action plan to meet the Requirements to the timetable set out in paragraph ES.7 of this report
  - ii) agree the action plan with their senior management, and confirm that it is appropriately resourced
  - iii) share the action plan with the Office for Statistics Regulation, publish it alongside the statistics, and explain to users and suppliers how it will engage with them in delivering the plan
  - iv) seek out peers and support services that can help in delivering the plan – for example, [the National Statistician's Good Practice Team](#)
  - v) agree with the regulatory team, how often, and in what form, the statistics team would like to engage about progress against the action plan – for example, some teams choose to meet with the regulatory team once a month
- the statistics team should provide full formal written evidence to the Office for Statistics Regulation by the deadline of 31 March 2017 as set out in paragraph ES.7 of this report. There is no set format for reporting, except that NIHE should demonstrate that it has addressed the findings given in Tables 1 to 3 and provide links to any published or internal documents as support
- the regulatory team will review the evidence within 10 working days and arrange to provide feedback to the statistics team. As part of this process, the regulatory team will talk again to users to establish how their experience of the statistics has changed. When the regulatory team is satisfied that the Requirements have been fully met, their conclusions will

be quality assured by Office for Statistics Regulation's senior management and then presented to the Authority's Regulation Committee to confirm designation. The Director General will then write publicly to the lead official to confirm the decision

- in the event that Requirements are not fully met within the agreed timetable, the Authority will implement [escalation procedures](#).

A4.2 Based on experience, the Office for Statistics Regulation strongly encourages statistics teams to:

- engage with the detailed thinking of the Assessment report, and revisit it regularly. The regulation team will be seeking evidence that the statisticians are demonstrating curiosity and are challenging their own thinking around delivering value, quality and trustworthiness. The Requirements in this report should not be viewed as a simple checklist
- view the responsibility for meeting the Requirements as falling to the organisation as a whole, not just the team that produces the statistics.
- engage users early, not just to keep them updated, users can often offer valuable insight and expertise
- contact the regulatory team at any time if there are any questions or concerns

A4.3 Responsibility for complying with the Code of Practice does not end with the award of the National Statistics designation. It is the statistics producers' responsibility to maintain compliance and also to improve the statistics on a continuous basis. The Office for Statistics Regulation encourages statistics producers to discuss promptly with the regulatory team any concerns about whether its statistics are meeting the appropriate standards. National Statistics status can be removed at any point when the highest standards are not maintained, and reinstated only when standards are restored.