
Mark Pont, Assessment Programme Lead

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Ministry for Housing, Communities and Local Government (MHCLG)
(by email)

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Dear Sandra

English Housing Survey statistics including Estimates of leasehold dwellings

As you are aware, we recently completed our review of the compliance of the [English Housing Survey \(EHS\) statistics](#) against the [Code of Practice for Statistics](#). I am pleased to confirm that EHS statistics should continue to be designated as National Statistics. As part of this work, we also reviewed your [experimental official statistics on the number of leasehold dwellings in England](#), as the EHS is the main data source for these estimates, and have offered some suggested developments in the annex to this letter.

We initiated this review following the public commitment we made in our 2020/21 [Regulatory Work Programme](#) to focus on statistics about key issues within Housing. We appreciate the positive and constructive way that the team engaged with us during the review, especially as we continue through these challenging times. We found a range of positive features that demonstrate the trustworthiness, quality, and value of the statistics:

- The EHS statistics are comprehensive, accessible and professionally compiled. The EHS headline report presents an authoritative account of the main trends in household numbers, tenure and housing conditions, supported by visuals to aid interpretation (for example, the movers by tenure diagram). The separate topic reports and factsheets add additional insight on a range of themes
- Extensive technical and quality information is clearly and accessibly set out. This includes an assessment of the EHS against the European Statistical System quality dimensions, standard errors and confidence intervals published routinely alongside the results, and a technical report setting the overall methods approach in detail
- Quickly moving the EHS data collection to telephone interviewing this year and adapting the physical survey to take place outside of the property, with plans to draw on Energy Performance Certificate (EPC) and Valuation Office Agency (VOA) data to inform the adapted physical survey approach
- Introducing an innovative follow-up panel survey this year to explore how the circumstances of 5000 households have changed since the start of the pandemic
- Plans to improve the timeliness of EHS headline results by one-month from this year onwards by publishing in December rather than January, including the panel survey wave one results this year
- Regular engagement with the survey contractors – NatCen, the Building Research Establishment (BRE) and CADS Housing Surveys – through the year, and with policy users to inform decisions around EHS topic modules and thematic reports

- Developing experimental leasehold dwellings statistics to fill a longstanding data gap of policy and user interest. Further details are included in the annex to this letter
- EHS data being a long-established source for wider reuse via the UK Data Service
- Plans to consider improvements to the accessibility of some EHS outputs where feasible, such as publishing in html and using tools, such as Power BI.

We identified some areas where the public value of the statistics could be improved, in order to continue to meet the high standards required of National Statistics:

- To support transparency regarding planned developments of EHS statistics, including innovations to overcome the data collection challenges posed by COVID-19, publish details about future development plans for the EHS statistics and the team's overall approach to user engagement, so that users are aware of planned changes in advance and are clear about the available channels to feed in their views
- Adding further insight and value to the statistical commentary where possible, for example by including wider context such as referring to relevant policies and drawing on related third-party data sources (for example, additional insights from MHCLG Council Taxbase statistics on second homes)
- The ability to compare housing conditions across the UK nations continues to be of interest for users. It is great the BRE has produced, on behalf of the four UK nations, "A snapshot of housing conditions throughout the UK". It would be helpful to provide more-prominent links to this work to assist such users
- Reduce the number of individuals granted pre-release access, wherever possible
- Although the EHS outputs are primarily based on survey results, where additional administrative data are used (for example, EPC data), we expect producers to have their own assurance of the quality of each source and its suitability for their use individually, building on the assurances provided by the data suppliers. Producers should do this by engaging with data suppliers in a way that is proportionate to the materiality of each source in the production of the final statistics. Our [administrative data quality assurance guidance](#) may be useful to refer to when doing this.

The suspension of all face-to-face surveys due to COVID-19 has created challenges for the EHS data collection. We discussed this in detail with your statisticians and heard of their innovative work and plans in this context, such as moving to panel, telephone and online data collection, and trialing the use of an app for respondents to video record evidence inside the property for the physical survey. We welcome that EHS statisticians share knowledge of these planned developments with other UK and Republic of Ireland statisticians through the Five Nations House Conditions Surveys group. Given the uncertainty and changing nature of events, we welcome that the team has agreed to keep in contact with us as their plans progress.

Please do not hesitate to get in touch if you would like to discuss any aspects of this letter further. I am copying this letter to Reannan Rottier, EHS Lead Statistician.

Yours sincerely



Mark Pont

Assessment Programme Lead

Annex 1: Suggested developments for leasehold dwellings statistics

The published experimental leasehold dwellings statistics are a welcome innovation, and were developed in 2014-15 to fill a longstanding data gap of policy and user interest. The leasehold dwellings statistics can be used to inform the development and monitoring housing policies at a regional, and national level, including monitoring the impact of regulating the leasehold market. We welcome the improved timeliness of the 2018-19 leasehold dwelling statistics and support the team's ambitions to publish them as part of the main EHS outputs in 2021. Our review has identified some areas that we consider it would be good for MHCLG to consider as part of its own developments, to enhance the trustworthiness, quality and value of the leasehold dwellings statistics:

- Develop the statistical commentary to highlight the key questions that the statistics are able to answer, for example in relation to pertinent debates, relevant government policies, initiatives or targets
- Better insight could be drawn from the statistics by describing the various approaches that have been taken to estimating the number of leasehold dwellings, and their strengths and weaknesses. For example:
 - explain more prominently in the bulletin the difficulties in accurately counting the number of leasehold dwellings, building on material already included on how the EHS leasehold measure alone warranted a new approach
 - given the slightly confusing landscape of leasehold situations, explain more clearly the differences between sets of estimates such as:
 - why numbers for social sector leasehold dwellings are low at 234 thousand compared to 4.2 million the private sector
 - why social and private sector estimates are not comparable (i.e. that leasehold properties in the social sector, the local authority or housing association is the leaseholder, not the social tenant).
- Update the linked [2014 Residential leasehold dwellings in England Technical paper](#), to provide clarity around some aspects of methods and quality, including:
 - the statisticians' assurances around the suitability of the individual administrative sources used. A low level of data quality concern is reported for the statistics overall, but the rationale for this rating is not clear and a limited assessment of assurance for the individual administrative sources is provided. Assurance should be informed by an understanding of the data collection operational context and quality assurance for each source, and the nature of the arrangements and relationships held with third-party data suppliers. Our [administrative data quality assurance guidance](#) may be useful to refer to when doing this
 - explanations around the statistics evaluation in reference to additional sources available triangulate the results or enhance insights (for example, the Regulator for Social Housing is due to publish new statistics on the number of units held by private registered providers on a leasehold and freehold basis in 2021)
 - details on the new calibration methods and the rationale for their use over the previous imputation approach

- the strengths and limitations of the EHS sample design for measuring the extent of the leasehold population, given the skewed distribution of leasehold properties (with around two thirds of leasehold dwellings accounted for by flats in London and houses in the North West)
- details of the matching methods used and the characteristics of unmatched cases
- confidence intervals for lower-level estimate breakdowns to provide greater clarity around potential uncertainty in the estimates.