

Consultation response

DCLG: Consultation on proposed changes to the Department's statistics

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About Shelter

Shelter is a national campaigning charity that provides practical advice, support and innovative services. More than one million people a year come to us for advice and support via our website, helplines and national network of services.

We help people to find and keep a home in a place where they can thrive, and tackle the root causes of bad housing by campaigning for new laws, policies, and solutions.

This work gives us direct experience of the various problems caused by the shortage of affordable housing across all tenures. Our services include:

- A national network of over 40 advice and support services
- Shelter's free housing advice helpline which runs from 8am–8pm (8am-5pm on Saturdays and Sundays)
- Shelter's website (shelter.org.uk/getadvice) which provides advice online
- The CLG-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, who are approached by people seeking housing advice
- A number of specialist services promoting innovative solutions to particular homelessness and housing problems. These include Housing Support Services which work with formerly homeless families, and the Shelter Inclusion Project, which works with families, couples and single people who are alleged to have been involved in antisocial behaviour. The aim of these services is to sustain tenancies and ensure people live successfully in the community.

We also campaign for new laws and policies – as well as more investment – to improve the lives of homeless and badly housed people, now and in the future.

Introduction

Statistics produced by DCLG form a vital part of the evidence base supporting Shelter's work on homelessness and bad housing. Our engagement with the public and the media has repeatedly shown a desire amongst the wider population for robust statistics which demonstrate the situation at a national, regional and local level, and allow the tracking of the impact of policy and funding changes; DCLG are foremost in providing these. As a result, we welcome the opportunity to respond to this consultation.

We will only respond to two of the three parts of the consultation; as we do not make use of the Land Use Change Statistics, we will omit the first part.

Section 2 - Local Authority Housing Data Collection

Are you content with the proposed new ELASH form?

Shelter is mostly content with the proposed new form.

Do you have any suggestions for new data items that should be collected through the new housing form?

We would like to have more information gathered about Local Authority enforcement actions regarding standards in the private rented sector.

Presently the only information available on this subject is about successful prosecutions carried out against landlords. There is no record of the range of other action undertaken by Environmental Health Officers to effect change for private tenants. Given the expansion of the sector we feel it is important to gather information about the approaches being taken to ensure that tenants are being treated fairly, and to identify where there is good practice which might be shared.

To better understand why this is so vital, we recommend the following document: [Asserting Authority: Calling time on rogue landlords](#) .

Section 3 - Regional Statistics

Do you agree with the proposal to end the publication of statistics at the former Government Office region level?

Shelter does not agree with this proposal.

What alternative presentation would you find helpful?

We assume that where data is gathered at a Local Authority level, it will continue to be so. Given this, should regional level data be discontinued, then our preferred option would be for NUTS2 level data to be made available in place of regional data.

However, for the sake of continuity, and consistency with data released by other government departments, we would strongly urge DCLG to reconsider the abolition of regional statistics, particularly with regard to English Housing Survey data.

For any geographical level suggested please explain how the statistics are or would be used, and what actions and decisions are likely to be taken using them.

Shelter uses these statistics to assess the effectiveness of government policies, plan the location of our services, and construct advice marketing campaigns. Regional level figures are crucial in providing an

overview of variations across the country, especially where local level figures are very small, or in surveys where sample sizes are too small to allow robust sub-regional analysis. (Indeed, there are some subjects in the Survey which already use a three-year average to provide a workable estimate of regional level data; this implies that going even to NUTS2 level would be impractical.)

For example, our report 'Homes for the Future' used regional-level data to extrapolate the newly arising need and demand for housing across the country, drawing a regional picture of the level of new housing provision which would be necessary to meet it. More recently, our discussion paper 'The forgotten households' used regional level data to map the distribution of low-income households who qualify for neither state support for housing nor low cost home ownership schemes. As well as these examples, it is usual for Shelter, when looking at local situations, to compare the local picture to the regional one; this gives a more appropriate baseline comparator, where the national picture is too diverse to give a meaningful comparison.

If we stop publishing statistics at a regional level, would there be an impact on you or your customers?

Yes.

If yes, what would this impact be?

As noted above, regional level figures are crucial in providing an overview of variations across the country. They are also useful in showing a quick sub-national summary - a list of data for nine regions is easier to digest than a list of data for 30 NUTS2 areas. If the regional figures are no longer published, then Shelter - along with other users of the data - would have no choice but to gross up the figures themselves (for those datasets where regional level figures are a straight arithmetical total), or to attempt to replicate the methodology (for datasets such as the house price to income ratios). This would give rise to a situation where different users could be replicating efforts to create regional level figures, with no guarantee - particularly in the latter situation - that the methodology and thus the results would match. Quite apart from the efficiency losses caused by duplication of effort, the risk of different organisations creating different regional figures as no official ones exist would seem to run contrary to the Government's stated aim of increasing transparency and accountability for local communities.

This is particularly the case with survey datasets such as the English Housing Survey (EHS). Given the sample size of the survey, analysis below regional level is not deemed robust. However, there are many occasions on which the national headline is not detailed enough, and a regional figure is appropriate. This is particularly the case when considering the differences between London and the rest of the country; given the demographic, economic and infrastructure differences between London and the rest of the country, it is very important to be able to separate the figures.

Shelter is in the fortunate position of having the necessary capability, permissions and software to be able to analyse raw datasets from the EHS and other surveys which are deposited at the UK Data Archive. However, quite apart from the timeliness issues arising from having to wait for the dataset to be deposited, and the effort that would be required to replicate the published tables which are widely used by our Policy, Research and Services teams, not everybody is in this position. A discontinuation of the regional level data from the EHS would exclude many potential users - individuals, organisations and communities - from using the data.

For the national conversation about housing to move forward constructively, it is imperative that all participants in that conversation have access to the same, reliably sourced, data.