

Consultation response

## **DCLG Draft Statistics Plan for 2011/12**

June 2011

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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](http://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

From the English Housing Survey, which has formed a crucial part of the work Shelter has commissioned from Cambridge University on the impacts of changes to the Housing Benefit system, through the quarterly Statutory Homelessness statistics which provide a detailed picture of those worst hit by the housing crisis, to the live tables on the Communities website which are used daily to inform our planning, media and fundraising work, statistics produced by DCLG form a vital part of the evidence base supporting our work concerning 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 both a national and local level, and DCLG are foremost in providing these. As a result, we welcome the opportunity to respond to this consultation.

However, Shelter is very concerned about the extremely short deadline given to this consultation, particularly given the fact that the available time included four bank holidays. While we are pleased that following pressure from sector groups, a subsequent extension has been granted, the time available still falls short of the stated optimum length for consultations of 12 weeks, and we are still concerned that such a short deadline was established at all.

Furthermore, many of the proposals are lacking in detail, which makes commenting upon them very difficult. For instance, the section on Statutory Homelessness figures states that the planned action is to "Reduce detail of quarterly release to include the most high profile and volatile data with a more detailed publication at year end including less volatile demographic breakdowns." This does not make clear whether the information will still be collected and published through the raw data release, and just not included in the headline bulletin, or whether it will only be released on a yearly basis in any form. And more unhelpfully, it does not make clear which indicators are intended to be affected in this way. Shelter has had to seek clarification on a number of points such as these before being able to compose a response. We are worried that this lack of detail, combined with the original short timescale, will have had a negative impact on organisations' ability to effectively comment on these proposals. It is disappointing that consultees should have to ask follow-up questions in order to ascertain exactly what the proposals are.

With regard to those areas for which the detail has not yet been worked out, in particular the HSSA and BPSA, Shelter is keen that the sector should have an opportunity to comment on more concrete proposals when more detail is available. We would also question the validity of asking for comments on proposals which are not yet clear. Responses from DCLG officials have included suggestions that we should be advising on which indicators within the affected datasets we are keen to retain and which we have less use for. That this scope for comment exists at this stage is not clear from the consultation document; again, it is disappointing that consultees should have to find this out by asking DCLG staff.

We are also concerned that there appears to be no overall strategic direction or rationale to the proposals; in order to respond most effectively, consultees need to be aware of why decisions have been made and what the Department's priorities for statistical work are. For instance, if cost savings are the driving factor, it would be useful to include an estimate of the cost saving which each proposal would achieve. This would make an assessment of the proposals much more straightforward.

## **Housing and Homelessness - specific proposals**

Shelter's response will be confined to the proposals concerning Housing and Homelessness. We shall comment only on those topic areas where changes are suggested.

### **English Housing Survey Household Report; English Housing Survey Housing Stock Report**

While Shelter is, in principle, in favour of these reports being available earlier than they have been previously, it is still not explicit which charts and commentary it is proposed will be removed to enable this change. We would expect that the sector, perhaps through the English Housing Survey Steering Group, would be consulted on the particulars of any proposed change to these reports.

### **Statutory Homelessness Statistics**

This dataset is one which Shelter makes use of on an almost daily basis. Although we use a wide variety of data resources, it could be argued that this one is the most fundamental to our work. While we appreciate the reasoning behind the decision to reduce the frequency of collection of the less volatile indicators, Shelter believes that the reduction in detail described here will lead to a reduction in the flexibility of the information concerned; at the moment changes and developments can be tracked quarterly, enabling the early identification of potential trends, or the immediate impact of proposed changes included in the Localism Bill - this capability will vanish if the information is only available for financial year periods. We are concerned that this reduction is being proposed at the very time that these fundamental changes are being introduced. There is a considerable desire at a local level amongst the public and the media for detailed information of this type; to cease supplying it would appear to run contrary to the Government's stated aim of increasing transparency and accountability for local communities. It also does not appear consistent within one dataset to have some indicators available quarterly but others only annually.

### **Housing Strategy Statistical Appendix; Business Planning Statistical Appendix**

Shelter is aware of the need to review data collection from local authorities and will be happy to comment on detailed proposals for changes to these datasets - in particular the HSSA, which we make extensive use of - when these are available. We would be particularly concerned about any proposed cuts to the information gathered on stock levels, waiting lists, lettings and the provision of affordable housing, as these are the indicators which we use most frequently. We would also like to see the restoration of the indicators on private and RSL housing (around stock and vacancy levels) - which have not been included in recent iterations - to the main data tables.

### **Housing and Planning Statistics; Housing and Planning Key Facts (Compendium publications)**

Shelter has no objection to the cessation of these products, as long as the information compiled within them continues to be available elsewhere.

### **Mortgage Rescue Scheme (MRS) Monitoring Statistics**

Shelter is concerned that the cessation of this dataset will make it very difficult to monitor the operation of the Mortgage Rescue Scheme. It is not yet clear what information, if any, will be published by the Homes and Communities Agency (HCA) once they take over collection of information from MRS providers. The danger of losing access to this information is that it will be very difficult to independently quantify the effect of the programme, detracting from the aims of openness and transparency stated by the Government and possibly endangering renewal of the scheme, thereby placing in doubt the ability of many homeowners to avoid repossession in the future.

## **Electronic Survey of Empty Homes; Local Area Council Tax Dwellings ("Dwelling Stock by Council Tax Band")**

Shelter is concerned that the removal of these datasets will contribute to a narrowing of the data available at a local level. This seems to run counter to the Government's stated aim of increasing transparency and accountability for local communities. In particular, regarding data on empty homes, there is a need to monitor the extent of these properties in local areas; our recent report 'Taking Stock' identified the fact that these properties could in some areas make a significant contribution to the supply of housing at a local level.

We are also concerned that the only reason given for discontinuing these datasets is "Low use by the Department relative to other outputs"; this could be construed as indicating that the extent to which they are used by the sector and the public is of lesser importance - this too would run counter to the aims of transparency and openness.

## **Register of Licensed Houses in Multiple Occupation**

Shelter is very concerned that there will be no national measure or record of the number of HMO licenses issued. As changes to housing policy mean that the Private Rented Sector is being relied upon to an ever greater extent, both through proposals to allow local authorities to discharge their duty to house homeless households via a private letting, and the prevalence of the private sector as an outcome for households going through housing options interviews, it is increasingly important that data is collected on it. These changes, coupled with the forthcoming changes to Local Housing Allowance, and in particular the raising of the age threshold for the shared room rate, suggest that the HMO sector will become increasingly important. Removing this kind of resource will make it more difficult to understand what is happening in the sector, and will detract from the aims of transparency and openness stated by the Government. It also seems contrary to the point of licensing that no central record is kept of licensed HMOs - this could have the effect of placing more vulnerable households and individuals in danger from unsafe properties or unscrupulous landlords.