
Director General for Regulation

Scott Dennison, Deputy Director Housing and Planning Analysis Division
Sandra Tudor, Head of Profession for Statistics
Ministry of Housing, Communities and Local Government
(By email)

4 February 2019

Dear Scott and Sandra

We are writing to you following correspondence we received from Martin Boyd of the Leasehold Knowledge Partnership on 20 November. Mr. Boyd raised concerns about the Ministry of Housing, Communities and Local Government's statistics on *Estimating the number of leasehold dwellings in England*. This follows the concerns he raised with us in late 2017, after which we responded via email on 1 February and copied you into our reply.

We have spoken to the responsible analyst about this matter and shared details of Mr. Boyd's concern. We appreciate the Ministry's thorough response to the concern, which we have considered.

We continue to welcome MHCLG developing these experimental statistics which demonstrate you are responding to user needs and developing important outputs to address an identified gap. It provides an excellent opportunity to demonstrate your commitment to engaging users and meeting their needs. We also welcome your engagement with the GSS Good Practice Team to support your methods development.

However, in line with our previous response to Mr. Boyd, we think there are some further steps MHCLG could take to increase transparency and support users.

- I would encourage you to publish clearer information about the quality of the estimates, and the strengths and limitations of the data sources used to produce them, drawing on the Authority's [Quality Assurance for Administrative Data Regulatory standard](#). This should include a description of any limitations of the Land Registry data source used to match sample properties from the English Housing Survey.
- Publish fuller information on the advice received from the GSS Good Practice Team including their suggested areas for further development. We note that the Good Practice Team felt these estimates were likely to be based on the best approach given the available data. They also recommended that you should not remove the experimental status of the statistics at this point due to a number of areas of suggested development, which you are now working to address.
- Demonstrate publicly that the Ministry is taking steps to triangulate the estimates with other data sources. This should include considering any bias to the English Housing Survey, and whether any suggested changes to the annual estimate of leasehold dwellings can be corroborated with other sources.

- Publish clear plans about the future development of the estimates, drawing on the advice provided by the GSS Good Practice Team.

This information will help users understand the limitations with the data and make informed decisions about the suitability of these estimates for their use.

We welcome the developments you are already working on including improvements to the address matching procedure, and plans to make further improvements for the next release. As part of this ongoing development, we also welcome the Ministry confirming it is happy to hold further discussions with Mr. Boyd about his concerns and to investigate reasons for differences between the methodology, assumptions and data sources used by MHCLG and by Mr. Boyd. Mr. Boyd has confirmed that he is happy to share details of the approach he has taken to aid this dialogue.

We look forward to seeing the continued improvements you plan to make to these statistics and please let me know if you'd like to discuss any aspects of this letter.

I am copying this letter to Reannan Rottier at MHCLG.

Yours sincerely,



Ed Humpherson

Director General for Regulation