CIH submission to the Call for user views on the Statistical Data Return

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Summary of our key points

This is a response to the call from the Regulator for Social Housing (RSH) for user views on the Statistical Data Return. The RSH produces the publication and data: Statistical Data Return (SDR): Private registered providers of social housing in England in October each year. The consultation covers the topics for which data are collected as part of the SDR data collection.

CIH principally makes use of the SDR data for its annual UK Housing Review. This response has been prepared in collaboration with Gillian Young of Newhaven Research, who is the principal author of the compendium of tables in the Review.

Our key points are:

- It will be essential to ensure that the brevity of the planned briefing notes is not achieved at the expense of explaining important technical or policy developments.
- We suggest that the key topics (stock, rents) include a summary of changes in the stock of dwellings let at social rents.
- It would be premature to remove commentary on vacancies and evictions in light of the Homelessness Reduction Act that came into force in April 2018. In particular, there is likely to be considerable interest in the extent to which the increased emphasis on preventing homelessness impacts on PRP eviction rates.
- Publication of the full data by end of October and the briefing notes prior to this is acceptable and we would caution against seeking to produce the data earlier.
It would be helpful if, in addition to the existing set of rent tables, the rent data (for large PRPs) in respect of both social and affordable rented units was produced in a format more closely aligned with the LA rents data published by the MHCLG.

The excel format is very useful and although other formats may be of value it is essential that the excel spreadsheet format is retained.

In providing regional data, it would be helpful if standard statistical regions were to be used, rather than the larger regions used by Homes England.

**Detailed points for consideration by RSH**

Our detailed points relate to the questions posed in the consultation:

1. *What use do you currently make of the SDR publication document, and would anything be lost if the large publication was no longer available in future (given that all underlying data and short briefing notes would still be published)?*

Our main interest is in the published excel data, but we use the SDR commentary in conjunction with the data. This is mainly to ensure methodological and definitional issues are understood, including changes in data collection etc. The brief commentaries on policy developments are also useful for those whose work is mainly centred in other parts of the UK.

In principle, the move to a series of briefing notes to permit more timely publication of data is welcome. The proposed outline content for the different briefing notes is helpful. However, it will be essential to ensure that the brevity of the briefing notes is not achieved at the expense of explaining important technical or policy developments.

2. *Are the key topics we’ve suggested (stock levels, rents and stock movement) the most appropriate areas for briefing notes? Are there other areas of the SDR data you would like to see analysed and published in briefing note format?*

We concur that the key topics suggested are those of greatest interest for most users. The intention to produce additional material on topics such as the Decent Homes Standard, either within the existing briefing note or as an ad-hoc note as and when judged necessary is also acceptable.

One further suggestion is that the key topics (stock, rents) summarise changes in the stock of dwellings let at social rents. While it is possible to calculate such changes from the SDR data, and CIH does this, explicit commentary on this sub-topic would be very useful.

The briefing notes would benefit from the inclusion of a short statement explaining which topics are not covered, the reasons for this (i.e. due to lack of any significant change). Ideally this should be accompanied by a note directing readers to previous
written commentary (i.e. the SDR statistical commentary 2018) as well as the tabular data on such topics.

3. **Do you have any concerns or comments on the proposal to remove commentary on vacancies, sector characteristics, Decent Homes Standard, Evictions or Mutual exchanges (noting that data and tables would still be published)?**

Yes. It would be premature to remove commentary on vacancies and evictions in light of the Homelessness Reduction Act that came into force in April 2018. In particular, there is likely to be considerable interest in the extent to which the increased emphasis on preventing homelessness impacts on PRP eviction rates.

For much the same reasons, we believe that questions relating to evictions should be made mandatory as opposed to voluntary.

4. **At what time of year is the SDR information most valuable to you? Is the proposed acceleration of the timetable for stock and rent data likely to be helpful?**

The publication of the full data by end of October and the briefing notes prior to this is acceptable and we would caution against seeking to produce the data earlier as this could increase the pressure to reduce the time devoted to vital tasks such as data validation.

5. **Are there any other additional tables or cuts of the data that you would like to see which are not currently available?**

It would be helpful if, in addition to the existing set of rent tables, the rent data (for large PRPs) in respect of both social and affordable rented units was produced in a format more closely aligned with the LA rents data published by the MHCLG. Currently the LA rents data does not differentiate between general and supported (including sheltered) housing.

A different issue is the handling of London data on rents, given that the Mayor is promoting the ‘London Affordable Rent’ which in practice aims to be close to (but is unlikely to achieve) social rent levels. It is difficult to see a satisfactory solution to this although distinguishing units let at ‘London Affordable Rent’ from those let at ‘normal’ affordable rent would be helpful.

6. **Are the maps that are currently produced of use to you? Are there other graphical representations of data you would be keen to see?**

No comment - have not used.

7. **Do you find the current publication of the full SDR data file in one excel file helpful, or are there any other formats that you would prefer or be more useful?**
The excel format is very useful and although other formats (such as SPSS) may be of value it is essential that the excel spreadsheet format is retained for those of us whole use it to aggregate the data to regional level or other spatial areas of interest.

8. *Have you used the PRP look-up tool in 2018, if so was it useful? Are there any improvements you’d like to see in the provider look-up tool?*

No comment - have not used.

9. *Have you used the LA look-up tool in 2018, if so was it useful? Are there any improvements you’d like to see in the LA look-up tool?*

No comment - have not used.

10. *Do you have any views on the intended addition of regional summaries to the current geographic (local authority) look-up tool?*

Adding regional summaries to the LA look up tool would be a positive development, but it would also be useful to add regional codes to the excel spreadsheet too. It would be helpful if standard statistical regions were to be used, rather than the larger regions used by Homes England.

11. *Do you have any views on the proposal for a regional/LA trend look-up tool (likely to be published in 2020)?*

Consideration should be given to:
- Making evictions data mandatory
- Producing additional tables for PRP rents that are more closely aligned to LA social/affordable rents
- Revising the SDR to include data on letting that is harmonised with the LA data published by MHCLG
- Revising the technical paper that accompanies the SDR to help users understand the extent of comparability between LA and PRP data in England and in the longer term how compare with PRP/RSL statistics elsewhere in the UK.

Chartered Institute of Housing
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