

## Beyond 2011: The census and future provision of population statistics in England and Wales

### Response by London Councils

London Councils represents all 32 London boroughs, the City of London, the Mayors Office for Policy and Crime, and the London Fire and Emergency Planning Authority. London Councils is committed to fighting for more resources for London and getting the best possible deal for London's 33 councils. We develop policy, lobby government and others, and run a range of services designed to make life better for Londoners.

#### London Councils' key messages:

- This is a golden opportunity to address shortcomings in census and population statistics for London.
- It is felt that a national one-size fits all approach will fail to reflect the unique scale, complexity, growth and churn of London's population.
- In considering the two approaches, London Councils believes that: as a minimum:
  - Administrative data and surveys: the principle recommendations made in the 'Beyond 2011: Independent Review of Methodology' must be adequately addressed for this option to be considered a methodologically sound basis for replacing the census. If these were met satisfactorily, then a 'dual running' concurrent approach for the next census could be necessary.
  - Decennial online census: concerns with low response rates, imputation methodology and mid-year estimate methodology need to be addressed for London.
- In this context, London Councils believes that the Office for National Statistics (ONS) should:
  - Work closely with London local government to improve census and population statistics methodologies irrespective of the future approach taken.
  - Target sufficient resources to enable enumeration of the capital's hard-to-count populations, providing similar coverage, confidence and accuracy as the rest of the country for all population statistics.

- Produce a specific response on the adequacy of the proposed approaches and processes for London.

## Introduction

London Councils welcomes the opportunity to comment on the Government's proposals for the census and future provision of population statistics. London Councils has chosen not to use the ONS online response form as we feel that the questions asked on this alone are not adequate to reflect our opinion.

Between the last two censuses, London has seen its population increase by just over 1 million and at a faster rate (14 per cent) than the national average (8 per cent). Its growth has accounted for around a quarter of the total national population increase and this growth is set to continue on a similar scale to what has recently been experienced – current projects suggest a growth rate of 12 per cent between 2011 and 2021.

In conjunction with this growth, London has seen considerable levels of population churn and mobility from internal and international migration. Analysis of ONS data on migration flows shows that London has a high population turnover rate – almost double that of the rest of England for 2003-11 and a far greater rate than for any other region.

This scale of growth and movement makes estimating London's population and its characteristics profoundly difficult. Historically this can be seen from lower census response rates achieved in London and inaccurate mid-year population estimates that have used census information as the baseline.

## The importance of population to local government funding

ONS mid-year population estimates are of great importance for local authorities. London Councils estimates that £12 billion of London local government revenue funding for 2013/14 is determined with population as a factor. Inaccurate estimates risk under-funding local public services and increasing pressure on local resources, including council tax levels.

Historically, London has been consistently undercounted because of reliance on the 2001 census data in mid-year population estimates and consequently sub-national population projections. Undercounting due to low response rates in 2001, and inaccurate methods for measuring migration, has meant that some boroughs may have received less in formula grant, and other grants, than they should have.

In 2012/13, London Councils estimated the loss of funding through under-counting to be £580 per person from core local government funding. Similarly, London Councils' analysis of Formula Funding before damping for this current financial year shows that London boroughs would have been worse off by an estimated £190-200 million had the population figures been based on 2001 estimates and not the most recent census.

It is worth considering how population data is used within central government to distribute funding to local government. London Councils continues to argue that for London boroughs short-term migrants and day-time populations also bring considerable demands on local public services and need to be appropriately reflected in financing of these services. The latter includes overseas, domestic and day trip visitors as well as the substantial number of people who spend their working week in London, often renting or owning second homes. For example, the population of some boroughs can double, triple or even quadruple each day compared to the resident population figures<sup>1</sup>. At present, London Councils remains concerned that these metrics are not adequately reflected in the current distribution methodologies.

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<sup>1</sup> See GLA projections of daytime population: <http://data.london.gov.uk/datastore/package/daytime-population-borough>

Whilst this is not the focus of this consultation, it is important to recognise that information on short-term migrant populations and day-time populations is valuable for London boroughs and will be needed as outputs in future census and population statistics at quality and spatial levels comparable to the current estimates.

### The Challenge of Population Estimates in London

London has particular challenges in terms of its dwellings and make-up of population that increase the complexity of preparing accurate population estimates. Arguably, no other region in the country has, to the same degree, either individually or collectively, this combination of characteristics. These factors include:

- Second homes (some boroughs with the highest rate of second addresses for work nationally)
- Inaccessible properties (blocks of high-rise flats) and complex residential structures (commercial and residential combined)
- Living in rented accommodation (multiple-occupation and hidden households)
- Student and generally young populations (mobility and churn of these)
- BME communities (under-registration on electoral register, under-coverage in census returns) and asylum seeking/refugee communities (issues with engaging with state authorities)
- Diversity of languages
- Deprivation levels (some parts of London amongst the most deprived nationally)
- Short term migrants and visitors (the capital is the first destination for many to the UK)

This diversity and complexity in the make-up of London's populations and dwelling characteristics are, at a minimum, set to continue and perhaps more likely will become increasingly complex for population estimation purposes by the time of the next census and beyond.

### A one-size fits all approach risks continuing to fail London

In this context, London Councils believes that a national one-size fits all approach, as the current proposals suggest, will risk continuing to fail London.

As such, London Councils believes that there should, at a minimum, be recognition in the proposals that London requires sufficient resources to be allocated to census processes to address the lower coverage rates and confidence associated with estimating London's population. London Councils would therefore urge ONS, as part of its Beyond 2011 research programme, to review both proposed approaches and processes in light of whether these are sufficiently adequate for London and other large urban areas.

It may well be appropriate for London to have a separate approach to reflect the inherent difficulties in accurately estimating its population. London local government would welcome the opportunity to explore this and work with ONS in understanding the issues and improving both census processes and population statistics for the capital. The current lack of any recognition of London's specific needs in the proposed approaches combined with scant recognition of the important role local authorities already play in census taking is of concern and needs addressing.

Further technical comments are provided below.

### A census using administrative data with compulsory annual survey

This option would clearly be a new approach to estimating population statistics and because of its untried and untested nature, this option carries the highest levels of risk for accurately estimating populations and their characteristics.

London Councils has serious concerns for the viability of this option. ONS's own independent review of the methodology has concluded that there is, as yet, insufficient evidence to positively reply that this methodology provides a sound basis for replacing 2011 census methodology.<sup>2</sup>

London Councils would raise the following issues:

#### Lack of granular characteristic information

One of the key issues for local authorities with this approach is the lack of suitably granular outputs. It is felt that these proposed outputs would not deliver the level of detail required to meet local authority needs for planning and monitoring of services. Without this information, London boroughs could be faced with meeting the cost of addressing this information deficit through for example, commissioning independent surveys. This type of granular information is needed for example when considering the planning of new housing developments and the potential impacts on local communities.

#### The financial impact on local authorities

London Councils does not agree with ONS's valuation of census outputs compared to administrative data and annual surveys. The £5 million additional benefit<sup>3</sup> nationally from the more granular traditional census approach represents a minimal individual local authority benefit. London Councils believes this benefit to be much greater and indeed as mentioned the cost of commissioning this level of data would be much higher for local government as a result of not having this information. This would be an additional cost local government would face as a result.

There would be a clear loss of economy of scale in moving from a national to individual local authority production of granular population information. There would also be risks with non-comparability across geography and time between locally uncoordinated approaches.

#### Risk of low response rates with surveys

London Councils believes there are other considerable issues with a compulsory annual survey including ensuring that response rates are sufficiently high in London. As previously set out, there are specific difficulties in estimating London's population. Historically, London has experienced lower response rates under the existing arrangements compared to the national average. Despite the considerable work by London boroughs to raise awareness of the census. There are real risks that an annual survey would dilute the message to those communities that are hard-to-reach around the importance of responding. Currently the decennial approach enables a focused campaign to reach those most likely not to respond. Mobilisation each year to reach new potential non-responders would be resource intensive and arguably less efficient.

#### Administrative data and issues for London

At present, it is not clear how the use of administrative data will be an improvement on the current mid-year estimates. The Beyond 2011 research programme supporting papers (S1-S5) show that there are considerable coverage issues for London with various data sets that could potentially be used in producing estimates. These include: the NHS patient register, Electoral register, School Census, HESA student records and DWP and HMRC records. Each of these options suggests unique challenges when applied in London with little offered by way of how these will be overcome.

In London where much of the population base is transitional, the associated government datasets are not necessarily updated in parallel to movement in the population. London boroughs would need assurance that population estimates were of equivalent quality to other areas of the country

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<sup>2</sup> Beyond 2011: Independent Review of Methodology, C.Skinner, J.Hollis & M.Murphy, p.10.

<sup>3</sup> ONS 'Summary of the benefits of census information', September 2013, Appendix B, p.5

and to date this has not been demonstrated through the research programme. Without this, relying on these sources for population estimates will give an inaccurate count.

London Councils would also raise a concern that the proposals largely appear to ignore the role of local authorities, the data they hold locally such as council tax records and their potential to validate any centrally produced population statistics.

### Implementation risks

There are also concerns with the considerable risks around developing the infrastructure needed to enable data sharing. Whether this is through necessary development of new computer systems and/or legislation, there would be significant organisational issues to overcome in sharing of data across Government departments, particular in the light of previous experience such as developing I.T. systems for Universal Credit. The consultation document itself highlights the experience of Scandinavian countries and the length of time required to fully implement such an approach successfully.

London Councils would also raise two further issues for consideration, namely public acceptance for administrative data to be used in this way and the security issues around holding this data safely.

### Summary

If as it stands this option was agreed upon by Parliament as the preferred approach then London Councils believes that a 'dual running' approach to the next census should be undertaken. It would be necessary for an online census with 100% population coverage to be run concurrently, to enable any meaningful population statistics to be produced. This would help mitigate uncertainty around implementation of new methods and new approaches as well as development of new computer systems.

### **An online census once a decade**

London Councils believes that this option is of lower risk and offers the most potential to meet London's population statistics needs as it currently stands.

### Valuable smaller area statistics

London Councils welcomes the potential for the continued provision of detailed information at Output Area (OA) level as well as detailed cross-tabulation information. London boroughs need this to understand their communities, inform policy development and ensure service provision is appropriate.

For example, one borough has used census OA information to develop its housing policy and to map the incidence of private rented sector homes geographically. OA level data enabled analysis to show that concentrations of the private rented sector were around main roads and for plans to be formulated accordingly. This important finding would not have been possible from higher level geographic analysis.

Other service areas where this information is crucial include:

- Planning: assessing new housing developments child and adult yield estimates, developer contributions, S106 agreements, Community Infrastructure Plans and Community Infrastructure Levy charges as well as household projections determining housing requirements.
- Education: school places planning (a major pan-London issue).

- Transport: as part of the evidence base for understanding travel patterns and informing policy.
- Social Services: Joint Strategic Needs Assessments which are informed by detailed cross-tabulations and smaller area statistics for a range of characteristics: population, deprivation, disability, limiting long term illness, diversity/ethnicity, benefits and household structure data.
- Public health: assessment of needs to identify hot spots for issues. Population, ethnicity, age, gender, NS-SEC, religion, mortality and birth information at LSOA and postcode level.

To highlight the importance of sufficiently detailed information and by way of illustration, the Department of Education (DfE) will provide £4.3 billion over the course of Spending Review 2010 (2011-12 to 2014-15) for school capital funding. The primary basis of allocation is current and future estimations of school populations at small planning levels. The absence of sufficiently granular and accurate information on pupil numbers could have a significant impact on the distribution of this funding and could increase the already considerable pressure on school places in London – by 2016-17, London faces a shortage in primary and secondary school places of 118,000.

The GLA's population projections as well as the School Rolls Projection service are important to many London boroughs in informing their medium term planning for areas such as housing requirements and provision of school places as well as other service areas. These projections rely on OA data to inform them so any loss of this information will have consequences for the projections and their use by London boroughs.

#### Fully inclusive completion process

The primarily online approach is welcome for its potential to improve the quality of information collected and the efficiency in processing responses. It is also recognised that the online approach will be positive for certain groups of people who can complete the return in this way. However, it is also vital that there should still be other formats for completing information to ensure that all potential respondents are reached.

#### The need for ONS to cooperate with London local government

London Councils would also stress that lessons must be learnt from the 2011 census. A positive working relationship between ONS and London boroughs was developed through planning and delivery of the most recent census and this was a contributing factor in raising the response rates compared to 2001. However, local authorities are best placed to understand how to engage with their local communities, particularly those with historically low response rates such as younger adults and those living in the private rented and social rented sectors.

#### Imputation methodology must be improved

London Councils understands that ONS methodology for accounting for missing responses is to use the characteristics of the known population to estimate those of the unknown. London Councils would raise this as a significant risk and urge ONS to work closely with our member boroughs who have undertaken research to understand the types of people and communities that are typical non-responders to the census and other surveys in general. The hidden population can often have very different characteristics to that part of the population for which information is known. The incidence of numbers of hidden households and people needs to be understood to enable accurate population estimates, as well as their true characteristics.

#### Annual population estimates are inadequate

A related issue to the once a decade census approach has been the mid-year population estimates that have been produced using the census year as the baseline population estimate. As expressed previously there are risks that the true level of mobility and population churn from both internal and

international migration is not adequately captured for London boroughs. London Councils strongly believes ONS and DCLG should focus efforts and resources on understanding this characteristic of London's population to achieve a better estimation process that reflects the true annual change in London's population. One example could be to evaluate population estimates within the context of using administrative data and housing stock data to help improve accuracy.

London Councils welcomes the work done through the Migration Improvement Programme to better understand population movements but would urge that continued work be undertaken in this area to improve understanding. To this effect, London Councils would highlight one of the recommendations made by the Public Administration Select Committee in its July 2013 report for local area migration statistics. Namely that, new sources of data on international migration that are robust enough to provide accurate estimates of annual migration flows to and from local authority areas must be developed.

**London Councils  
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