



Ministry of Housing,  
Communities &  
Local Government



# English Housing Survey

Data security strategy arrangements

Version 4

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# Introduction

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1. This document is issued and published by the Head of Profession for Statistics in the Ministry of Housing, Communities and Local Government (MHCLG), jointly with, and on behalf of its counterpart in the Department for Business, Energy and Industrial Strategy (BEIS). BEIS contribute funding towards the English Housing Survey (EHS) and receive early access to EHS data in order to allow it to produce official statistics covering its own policy responsibilities. MHCLG, along with BEIS, perform the role of 'Data Controller' as defined by the Data Protection Act 1988.
2. The document describes the specific data access, data sharing and data security arrangements which the Departments and their contractors have put in place in order to strike an appropriate balance between their own use of the EHS data for aggregate statistical purposes, and in ways which will contribute to the development, implementation, and monitoring of government policy, and their simultaneous duty to comply with: the Data Protection Act 2018; the General Data Protection Regulation and any applicable national implementing laws amended from time to time; the Human Rights Act 1998; and all applicable law about the processing of personal data and privacy.
3. It sets out, in particular, the principles and procedures to which all organisations will adhere in order to comply with the Code of Practice for Official Statistics. Thus ensuring that the data provided by respondents to the EHS are kept secure during the process of producing statistics, used for statistical purposes only, and that the resultant statistics do not disclose the identity of an individual or organisation, or any private information about them.
4. A Memorandum of Understanding in Relation to Data Sharing between MHCLG and BEIS provides further detail on arrangements between the two departments with joint data control of EHS, published here: <https://www.gov.uk/guidance/english-housing-survey-information-for-households>
5. The responsible analyst for this document is: Stephanie Freeth, Housing and Planning Analysis Division, MHCLG. If you have any queries about this document, would like any further information, please contact [ehs@communities.gov.uk](mailto:ehs@communities.gov.uk).

# Section 1

## Background

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- 1.1 The EHS was launched in April 2008 and brought together two previous surveys funded by MHCLG, the English House Condition Survey (EHCS) and the Survey of English Housing (SEH).
- 1.2 The EHS collects a range of data relating to respondents' past and current housing circumstances and, through a physical inspection of their property, a range of information relating to the condition and energy efficiency of their homes. Photographs of the exterior of the property are also taken.
- 1.3 The surveys up to 2011-12 were managed through three separate contracts: one with the Office for National Statistics (ONS) who managed the interview fieldwork; another with Miller Mitchell Burley Lane - CA Designs (MMBL-CADS) who managed the surveying field force; and the third with the Building Research Establishment (BRE) who managed the validation and delivery of the physical survey data
- 1.4 In December 2011, a contract for the survey years 2012-13, 2013-14 and 2014-15 (with an option to extend to 2015-16) was awarded to a consortium led by the National Centre for Social Research (NatCen Social Research). NatCen Social Research undertake the household interviews, and have responsibility for the sampling and weighting process working with Bryson Purdon Social Research, along with overall project management. CADS Housing Surveys recruit and manage the large surveyor field force undertaking the physical inspections. BRE are responsible for delivering training to the EHS surveyors, data validation of the physical survey data, and subsequent data modelling to deliver some of the key measures for analysis. In March 2016, MHCLG awarded the contract to deliver survey years 2016-17, 2017-18 and 2018-19 (with an option to extend to 2020-21) to NatCen Social Research, in consortium with CADS and BRE.
- 1.5 As part of the statistical production process, and since the discontinuation of the market value component of the EHS in 2009-10, MHCLG uses Valuation Office Agency (VOA) for the annual collection of property values. This is achieved by matching postcodes to council tax band information in order to feed into modelling undertaken by the survey contractors for the production of statistics only. This information is NOT used for any purposes outside the survey e.g. in relation to council tax band revaluations.
- 1.6 MHCLG owns and funds the EHS and receives funding contribution from BEIS. MHCLG commissions and manages the project and is responsible for consulting users to update the content and design of the survey. BEIS and

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MHCLG are responsible for analysis and dissemination of the results in their respective policy areas.

- 1.7 MHCLG and BEIS make a commitment to all respondents in the survey that the data they provide will be treated in the strictest confidence by the government survey teams and their appointed contractors in accordance with the Data Protection Act 2018. The data will be used to produce anonymous official statistics for decision making in government, and for genuine research and statistical purposes only.

## Section 2

# General principles

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- 2.1 As part of the contractual undertakings, all organisations contracted to run the EHS undertake to protect the confidentiality of the data collected as set out in the Data Protection Act and the Code of Practice for Statistics and associated protocols. All interviewers and surveyors working on the survey agree to abide by a confidentiality policy set out by NatCen Social Research/CADS Housing Surveys.
- 2.2 All information from the Survey is handled in strictest confidence. It is used to produce aggregated statistics for decision-making in government and for genuine research and statistical purposes only. No information which could be used to identify individual households is released outside the government survey and contractor teams.
- 2.3 A range of outputs from the EHS are delivered by the contractors to the MHCLG and the method of delivering and handling the data by MHCLG and their contractors will vary according to the level of anonymity associated with each set of outputs. These are described separately below.
- 2.4 Data are processed in accordance with the Data Protection Act (2018). MHCLG, BRE and NatCen Social Research are registered with the Data Protection Act - MHCLG: Z7123035 BRE: Z4827934 NatCen Z6133294. Additionally, NatCen has ISO 27001 accreditation (GB10/80232).
- 2.5 BEIS, as Data Controllers of the EHS, receive early access to published EHS data, including responses to the survey alongside address and postcode details, for the purpose of complementary statistical production. A Memorandum of Understanding in Relation to Data Sharing is in place with the relevant data management team within BEIS.
- 2.6 Contractors appointed by MHCLG to deliver the EHS will only access and utilise EHS data to deliver the data requirements set out in the EHS contract with MHCLG. Similarly, any contractors appointed by BEIS will only access and utilise whichever EHS data are required to deliver the specific analyses described in their contracts with the respective departments, for the purpose of complementary statistical production only.
- 2.7 Access to these data will not breach any commitments made to respondents to protect the confidentiality of the data provided.

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- 2.8 The information will only be used for valid statistical research purposes and its use will meet the criteria and principles established in the: Code of Practice for Statistics; National Statistician’s Quality Review<sup>1</sup>, Office for National Statistics’ Disclosure Control for Tables produced from surveys<sup>2</sup>; Office for National Statistics’ Disclosure Control for Microdata produced from surveys<sup>3</sup>; and UK Statistics Authority’s guidance on using the General Data Protection Regulation for statistical purposes<sup>4</sup>. The principles of the Freedom of Information Act will also apply.
- 2.9 Responsibility for the implementation of these measures rests with the MHCLG EHS Project Manager. The team undertake to ensure that their staff, including any contractors, know, understand and guarantee to maintain the confidentiality requirements of each of their statistical resources and will ensure that anyone involved with the processing of the statistical resource is aware of the penalties of wrongful disclosure.
- 2.10 The physical and technical security of the data will be maintained at all times. Data are held on firewall-protected, dedicated data servers accessible only by the MHCLG or their contractor teams. Wherever possible data are held in an anonymised form identified through unique case serial numbers only, and with no address details attached.
- 2.11 The confidentiality of the data will be preserved at all times and no information will be released in publications, tabulations or data sets that are likely to identify an individual unless specifically agreed with them.
- 2.12 Any disputes arising between organisations will be resolved initially between the principals to these agreements. Otherwise, outstanding issues will be referred to the National Statistician.

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<sup>1</sup> <https://gss.civilservice.gov.uk/policy-store/privacy-and-data-confidentiality-methods-a-national-statisticians-quality-review-nsqr/>

<sup>2</sup> <https://gss.civilservice.gov.uk/policy-store/gssgsr-disclosure-control-guidance-for-tables-produced-from-surveys/>

<sup>3</sup> <https://gss.civilservice.gov.uk/policy-store/gssgsr-disclosure-control-guidance-for-microdata-produced-from-social-surveys/>

<sup>4</sup> <https://gss.civilservice.gov.uk/policy-store/uk-statistics-authority-guidance-on-the-general-data-protection-regulation-gdpr/>

# Section 3

## Anonymised data files

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- 3.1 The main set of outputs to be delivered to MHCLG by the data collection contractors encompasses a set of anonymised data files at household and individual level containing data from the interview survey and physical survey. These files will be used by a team of analysts at MHCLG and their appointed contractors to generate and report aggregate level information only. MHCLG accepts a duty of care to ensure the data are not misused by its own study team or by any organisation it contracts to assist in analysis of the data.
- 3.2 MHCLG may make anonymised survey data available to external organisations for bona fide research purposes e.g. for secondary analysis by academic researchers through the UK Data Archive. Recipients of these data will be advised they must uphold the terms of the Code of Practice for Official Statistics, the National Statistician's Quality Review<sup>5</sup> as well as the Office for National Statistics' Disclosure Control for Tables produced from surveys<sup>6</sup> and thereby meet the pledge of confidentiality given to survey respondents.
- 3.3 When making the datasets available, and to minimise the possibility of non-intentional disclosure of information, MHCLG will seek to remove all identifiers that might permit intentional or accidental disclosure of personal information. When depositing the datasets at the UK Data Archive any textual information (string variables) in which disclosive information could be present will be removed.
- 3.4 Similarly any publications or tabulations based on data from the survey will be produced at an aggregated level so that the potential of accidental disclosure of information is minimal.
- 3.5 Researchers based at UK academic institutions (including some research centres) may apply for access to more detailed but anonymous data from the survey e.g. geographical identifiers including postcodes, via the Secure Data Service of the UK Data Archive. Restricted access to data will be given only to approved researchers who will conduct analyses within a secure remote environment. All outputs (including tables and interpretations) undergo a Statistical Disclosure Control process to ensure that individual respondents or

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<sup>5</sup> <https://gss.civilservice.gov.uk/policy-store/privacy-and-data-confidentiality-methods-a-national-statisticians-quality-review-nsqr/>

<sup>6</sup> <https://gss.civilservice.gov.uk/policy-store/gssgsr-disclosure-control-guidance-for-tables-produced-from-surveys/>

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households cannot be identified. Access by commercial organisations for commercial purposes is not permitted.

# Section 4

## Address details

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- 4.1 MHCLG also receives a file of all sampled addresses (not names) with an identifier to link these to the associated data records on the above anonymised data files. A range of geographic identifiers including census output areas are also delivered attached to each address. This information may be used by the MHCLG if required to:
- Collect additional information for the EHS sampled dwellings to create a comprehensive database for aggregated statistical analysis purposes only.
  - Re-contact households or occupants of sampled dwellings to generate a longitudinal component for future phases of the EHS (provided explicit consent for such re-contact is agreed by respondents during the interview).
  - Re-contact households or occupants of sampled dwellings to conduct a MHCLG follow-up to the EHS to collect more data on specific issues (provided explicit consent for such re-contact is agreed by respondents during the interview).
  - Match against other geographic data sets (see below).
- 4.2 The address and main data files contain information that, if matched together, will enable the creation of disclosive information relating to individuals and dwellings. Consequently, additional safeguards have been put in place, as detailed below.
- 4.3 The sample of addresses is initially drawn by a contractor to NatCen (UK Geographics) who select addresses from the Postcode Address File (PAF) and provide to BRE and NatCen Social Research. They then deliver the address file to MHCLG on an encrypted password protected file to the MHCLG EHS data base manager via a secure file transfer portal (FTP). The password does not accompany the data but is communicated to MHCLG separately. The EHS data base manager stores the file on a part of MHCLG's secure IT storage system that is accessible by the EHS data base manager and a limited number of named members of the EHS study team on a need to access basis.
- 4.4 MHCLG are responsible for the security of this file and for ensuring that there is no unauthorised access to its contents. Its use within MHCLG will be restricted to those members of the EHS study team or of its contractors

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(namely BRE / NatCen Social Research) who need to access the file for bona fide analytical purposes e.g. query resolution.

4.5 MHCLG and its contractors may match this file against other geographic data sets to provide further classificatory variables to assist with analysis. These derived classifications will be used to support analysis of the EHS by MHCLG and its partners only and will only be released to external users if at a sufficiently high level of aggregation to avoid data disclosure. Any matching or linking will conform to the principles of the Code of Practice for Statistics.

4.6 MHCLG will only make this address information available outside the MHCLG team in the following circumstances:

- Where another organisation formally contracted to MHCLG draws a longitudinal sample of addresses to revisit in either one subsequent wave of the EHS or in a follow-up exercise to collect, for example, more detailed information of particular policy interest. Associated survey data will not be made available unless specifically needed for bona fide analytical purposes. All such contractors would be formally bound under the terms of their contract to non-disclosure of any information relating to this survey.
- Where it has been agreed that the consent of respondents to be re-contacted by MHCLG, BEIS or their contractors will be sought as part of the initial English Housing Survey interview, and where only those respondents who give their consent will be re-contacted directly by MHCLG (or BEIS).
- The above will apply except in the extremely limited circumstance where the purpose of the follow up contact is to establish a sample of dwellings (rather than of the occupants) in which case the prior permission of the current occupants will not be required.
- Where another Government Department or their appointed agent wish to undertake a follow-up survey to the EHS e.g. to collect more detailed energy related data. Wherever possible, MHCLG will seek to ensure no single organisation holds both the address file and the associated data records. Where another Department or agency needs access to both the address identifiers and the associated data records then MHCLG will ensure that the other government department and their contractor sign an Access Agreement. As joint Data Controllers, BEIS will hold both the address file and associated data records, the terms of this data sharing are covered in the aforementioned Memorandum of Understanding In Relation to Data Sharing.
- Any re-contacts with householders will only be made after NatCen Social Research or MHCLG have obtained active consent for their

address and associated data records to be passed to the Government Department concerned.

- Where another public sector agency needs to match address information against administrative records in order to establish additional information about the particular address for the purposes of enhanced internal statistical processing/analyses only e.g. whether a dwelling has received a housing-related grant; ownership history etc. In these circumstances the data will remain non-disclosive because only the address details will be provided to the external body and not any associated data records.
  - At no time will either the address file and associated data files be made available to any organisation – public or private - for the purpose of interrogation of data relating to individuals or individual properties.
- 4.7 In delivering outputs to MHCLG, NatCen Social Research will indicate where consent has been obtained from households to be re-contacted.
- 4.8 CADS Housing Surveys require details of the selected sample addresses prior to the start of fieldwork. This information is provided in a file containing addresses (no names are provided) plus some geographical identifiers, and is sent via a secure file transfer portal. The information is used by CADS Housing Surveys to plan work for their surveyors.
- 4.9 During the course of the survey fieldwork NatCen Social Research upload regular encrypted data extracts to the secure CADS Housing Surveys website. Data provided for the full sample is restricted to information required to monitor fieldwork progress. Alongside this, address and contact information is provided for households that agree to take part in a Physical Survey. CADS Housing Surveys are not provided with access to the full interview data.
- 4.10 CADS Housing Surveys subsequently provide NatCen Social Research with general information on the progress of the Physical Survey. Responsibility for final delivery of anonymised data files from completed physical surveys to MHCLG rests with BRE. Prior to delivery to MHCLG, BRE provide selected anonymised files to NatCen Social Research for checking purposes each year to ensure interview and physical data are consistent.

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## Section 5

# Photographs of properties

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- 5.1 As part of the EHS physical survey, surveyors are instructed, with the occupants' verbal agreement, to take photographs of the exterior of the sampled property. Respondents are advised about this arrangement within the survey information leaflet.
- 5.2 MHCLG and its contractors may make use of the photographs for query resolution purposes and for illustrative purposes in reporting. If potentially disclosive photos are to be included in reports we will seek prior permission from the respondent. Photographs will not be released to external users either independently or alongside other data sets.

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