

# GREATER LONDON AUTHORITY

**Jennet Woolford**

Director of Population Statistics Directorate  
Health, Population and Methods  
Office for National Statistics

**Department: City Intelligence**

Date: 26 October 2023

Dear Jennet,

1. Thank you for the opportunity to comment on ONS's proposals for producing population and migration statistics, including data on the characteristics of persons and households.
2. While we recognise the tremendous effort and progress that ONS have made in investigating alternative sources and methods for producing population and migration statistics, the proposals, as laid out in the consultation document and associated papers do not meet the Greater London Authority's needs for population estimates and person and household characteristics. Detailed statistics for small areas and detailed groups will require a census in 2031.
3. In order to show viability, it is our view that alternative sources and methods for producing statistics need to run in parallel with current methods, across the full range of statistics, so that it can be shown that alternative methods are of at least the same level of quality and reliability. As yet, this has not been shown for any statistics at levels of geography that are needed for London.
4. Development of the DPM has not progressed sufficiently for the GLA to be confident that it will be able to produce accurate, consistent population estimates:
  - a. No mechanism for coverage adjustment has been proposed in the absence of a population census.
  - b. The proposals do not specify the geography for which annual population estimates by age and sex would be produced. The GLA require these data for very small levels of geography, such as Output Areas, for aggregation to different larger geographic areas.
  - c. GLA analysis of published experimental outputs from the DPM suggests the implementation of the methodology is not yet mature even at large geographic levels.

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5. The proposals do not demonstrate that ONS will be able to produce the detailed demographic, labour market and household characteristics (that are currently produced by the Census) that the GLA requires.
6. Some experimental administratively based characteristics outputs have been produced, for example for ethnic group, accommodation type and income for occupied addresses. However each of these outputs require much further development before they could be considered of usable quality. For example, the Admin-Based Ethnicity Statistics (ABES) have seen several iterations of outputs but the latest still show considerable biases compared to Census, even for aggregated broad ethnic groups. We require a detailed classification of ethnicity, such as the 19-way classification for equalities monitoring, and frequently use more detailed classifications, such as those from “write-in” responses, for targeting services for specific groups in London. We are not confident that good data sources can be included in ABES to address these issues.
7. Admin-based outputs cannot produce estimates for households and household relationships and hence include characteristics for occupied addresses. For some purposes and in some areas, occupied addresses will suffice but in areas where complex living arrangements are more widespread and for certain variables, such as housing need, care, deprivation measures and income, occupied addresses will not provide an appropriate base. The income of multiple households at an address cannot be used as a proxy for household income to understand living standards.
8. The proposals acknowledge that there are multiple characteristics that cannot be produced from administrative data. These include the protected characteristics religion, sexual orientation and gender identity as well as country of birth and language that characterise migrants and determine many service needs. Earlier reports by ONS proposed a large household survey for such characteristics (such a survey could also be used to add strength to admin-based statistics). These current proposals do not include plans for a new large-scale survey and no alternative methods such as small area estimation were suggested, so it is not clear how data on such characteristics would be produced.
9. The proposed baseline objective for all characteristics is for data to be produced annually for local authorities; there is no commitment to produce data for any smaller geographies, although it is expected that some admin-based estimates could be produced for smaller geographies including LSOAs. As a regional authority, the GLA needs data at relatively small levels of geography to inform other lines of work (e.g., economic development, industrial policy, etc.) and put in place effective regional policies. The GLA (and all local authorities) require data for small geographies including LSOAs and OAs. Comprehensive and accurate statistics for wards are a high priority which is not addressed in the proposals.
10. Despite the reservations we have given in our response to these proposals, the GLA strongly support ONS’s continuing efforts to improve population and migration statistics. We would welcome the opportunity to work with ONS in developing and quality assuring new sources and methods.

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Yours,

Ben Corr

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## About you

The ONS needs your name and email address to receive your consultation response. We may contact you about your response to this consultation.

We aim to be as open as possible in our decision making process. As part of this, we plan to publish an anonymised summary of the responses we receive. We will not publish names or other personal data of any individual respondent. However, the names of all organisations and groups responding to the consultation will be published in a list of respondents. Names of organisations and groups will not be linked to any comments given.

Please be aware that, as a public authority, we are subject to the [Freedom of Information Act](#) and can never completely guarantee that names and responses will not be published. To find out more, read our [privacy policy](#).

**Full name** Ben Corr

**Email address** ben.corr@london.gov.uk  
We will use this to confirm your response has been received.

### Are you answering this questionnaire on behalf of an organisation?

(Required)

- Yes
- No

If you are responding on behalf of an organisation:

### What is the name of the organisation?

Greater London Authority

### What sector does the organisation belong to?

(Required)

- Central government
- Devolved administration
- Local government
- Academia or research
- Religion or faith
- Charity or voluntary
- Business, industry or commercial
- Journalism or media
- Think tank
- No sector, I am responding in a personal capacity
- Other

If you selected 'Other', please provide your organisation's sector below.

**In the last 12 months, approximately how often have you used or referred to statistics from the ONS?**

- Daily
- A few times a week
- A few times a month
- A few times a year
- Less frequently than a few times a year
- Never

**What do you currently use the ONS's population and migration statistics for?**

(Required)

- Academic research
- Service provision or business planning
- Personal use
- Public policy
- Other (please state below)

## Your population and migration statistical needs

Please explain how you currently use the ONS's population and migration statistics?

We use ONS Population estimates for:

1. Monitoring overall size and changes in size of population by age and sex
2. Denominators for calculating rates in populations
3. Input to GLA demographic projections

We use ONS Population characteristics for:

4. Equalities monitoring
5. Characteristics and location of individual communities across London
6. Targeting and monitoring of service provision to individual groups
7. Input to models

*Throughout the consultation document we have outlined our proposals for changes to our population and migration statistics, with detail provided in section 3.*

**To what extent do these proposals meet your needs?**

- The proposals meet all of my needs
- The proposals meet some of my needs
- The proposals do not meet any of my needs

*We have outlined the potential benefits of the transformed system within section 6 of the consultation document.*

**Are your current information needs better met by these proposals?**

- Yes  No

**Which of your information needs are better met by these proposals? Please explain the reasons for your answer.**

**Would these proposals allow you to do anything new that you have not previously been able to do?**

- Yes
- No
- I don't know
- I have no need to do anything new

Please explain the reasons for your answer.

There is not enough evidence presented so far to answer this question.

There are potential benefits of more timely population estimates (rather than more frequent estimates); but it is not clear if the the DPM will produce reliable estimates earlier than the existing system.

Experimental small area income estimates have been published that might with much further development allow crosstabulation by equalities and housing characteristics. Estimates so far presented are incomplete and do not relate to households or families. Evidence has not been presented that these outputs can be developed to be of sufficient quality to meet our needs.

**Which of your current needs would not be met by these proposals? Please include reasons for your answer. For example, information around levels of detail, accuracy, timeliness or geography.**

#### **Quality of population estimates for London**

- It is not clear how high quality population estimates will be produced for all local authorities. ONS research indicates that it can produce reliable population estimates for most local authorities in England and Wales with more consistent level of quality over a 10 year period. Strategies for dealing with outlier local authorities, many of which are in London, have not been demonstrated.
- Supporting documentation shows that work investigating mechanisms for applying coverage adjustments (other than a decennial census) is ongoing and not yet at a stage where the likely quality of estimates produced using the proposed adjustment options can be meaningfully assessed. Earlier work included the option of a compulsory coverage survey as a necessary tool for dealing with under (and over) coverage. A more recent paper proposed using the TLFS for population coverage. The TLFS is voluntary survey with variable, but fairly low and likely biased response, so is unlikely to be suitable for use as a coverage survey. Also, the TLFS currently also relies on (census based) midyear estimates for its grossing weights. There would hence be no independent check of the population.
- No estimates of households and (for characteristics) no information on household relationships.

#### **Small area population estimates**

- ONS is not yet in a position to demonstrate the feasibility of, or commit to producing, outputs that we consider essential. For example, a key requirement for the GLA is the availability of annual small area population estimates (including for Output Areas) by age and sex. However, the proposal only states that "ONS will also explore the feasibility of producing population estimates for smaller geographical areas from the DPM, including the Output Area level".
- The expected quality of small area estimates by age and sex has not been discussed so the usability of these has not been demonstrated.

## **Characteristics**

- It is difficult to comment on the utility of the proposed estimates of characteristics because the proposals anticipate continuing improvements in methods. GLA recognises that ONS has undertaken work estimating some single characteristics and combinations of two or more characteristics, however all published estimates have been experimental, extrapolating from Census results and none have been of sufficient quality to be usable as standalone estimates of the characteristics they are intended to measure.
- For ethnic group, which has probably seen the most extensive programme of research, the administratively based estimates have not been demonstrated to be of similar or better quality than census estimates, even at LA level. It's doubtful that future work will produce usable estimates for the 19 ethnic groups. GLA require data for smaller geographies, and cross tabulation by protected and other characteristics. We also use groupings more detailed than the 19-way classification to describe the characteristics of particular ethnic sub-populations and target specific interventions.
- So far, no administrative data sources have been identified for country of birth, religion and language. Surveys would not produce small area or detailed responses which are required for these topics, and there would be very limited ability to cross tabulate by other characteristics.
- Even where estimates of characteristics have been produced, it is notable that the quality and utility of those estimates for several parts of London are particularly poor.
- Sexual orientation and gender identity, both protected characteristics, would have very limited information if only survey estimates – for example from the TLFS – were available. Estimates would probably be at region/ sub region only with very limited potential for cross tabulations.

While in the long term there is considerable potential in using administrative data to give insights into the characteristics of the population, while such outputs are being developed, it is essential to run systems in parallel to confirm the quality and utility of administratively-based statistics.

## Impact on your information needs

We are interested in how our proposal will impact your information needs.

In the consultation document we have outlined our ambition to deliver characteristics estimates at Local Authority level, with some being available at lower levels (for example Lower Super Output Area). See Section 3.3.3 of the consultation document for further detail.

### Do the proposed levels of geographic breakdown meet your information needs?

- Yes
- No
- I don't know

### What additional geographic breakdowns would you need? Please explain the reasons for your answer.

The use of administrative data could result in less detailed breakdowns for characteristics being available, particularly where more detailed breakdowns are collected in the census beyond standard tick-box options. See Section 3.3.3 of the consultation document for further detail.

Ward data are most widely used by Local Authorities. For London these are generally larger than MSOAs so more data could be produced than for statistical geographies. Best fit from OAs is suboptimal but could be acceptable; best fit from LSOAs would be unacceptable.

GLA demographic models require consistent components of change at local geographies below ward/MSOA, while the proposals do not commit to outputs below local authority.

Data for OAs would allow local authorities to build up local neighbourhoods and bespoke areas.

### Would this change in available detail still meet your needs?

- Yes
- No
- I don't know

### What impact would this change in available detail have on your use of our population and migration statistics? Please explain your answer.

Often our only source of information on locally significant populations (identified by ethnic group, country of birth, language) comes from census. We need to know some characteristics of these populations – such as age and sex, housing, health and labour market participation. We also need to know where these populations are located across London.

Without census, we would not be able to describe these populations, which would immediately limit our equalities monitoring. Without information on populations' location across London we would be limited in our ability to develop policies and hence interventions aimed at specific groups. And we would allocate resources less efficiently.

## Population definitions and estimates

Section 3.1.1 of the consultation document explains that we will continue to produce population and migration estimates based on our current 'usual resident' definition but are exploring alternative definitions.

**Do you need definitions for population and migration estimates other than 'usual resident'?**

- Yes
- No

- There is interest in alternative population bases for term-time/non-term-time, for estimates of short term populations, day-time populations etc. All of these would enable better service planning. There is also a significant demand for "now-cast" estimates where currently, teams in GLA and others use projections to proxy current figures and their characteristics

## Delivering future population estimates

Section 3.1 of the consultation document sets out our plans for future population estimates.

**For the usual resident population how frequently would you like population estimates? Please select the most important frequency for you.**

- More frequently than once a year
- Annually
- I don't use population estimates
- Other

If you ticked 'Other', please specify

Please explain the reasons for your selected frequency and how it would meet your needs.

- For most uses, annual estimates of the full detail by age/sex, particularly now-cast estimates are sufficient.
- One significant use of estimates is as denominators for various other datasets. Where these statistics are produced more frequently – quarterly or monthly, it would be useful to have population estimates to match that, particularly in areas that are seeing significant change. An example might be for benefit statistics or other labour market data. Such estimates might not require the full detail of age/sex, but for example, an estimate of the working age population. These statistics are used to monitor the conditions in London, such as by the London Prosperity Board and guide their work and planning.

Section 3.1 of the consultation document sets out our plans for delivering provisional and updated estimates.

**How timely would you like population estimates to be?**

- Early provisional estimates, followed by updated estimates 12 months after the reference period
- Updated estimates only, 12 months after the reference period
- I don't know
- I do not use population estimates

Please explain the reason for your answer.

- See comments above

**Data needs for genealogy and social history**

Section 3.5 of the consultation document outlines the potential to securely retain personal information obtained from administrative data used to create our statistics, for historical purposes.

**What details from population and social characteristics data do you see as being important to be preserved for future generations, if any? Please explain why this data is important to be preserved.**

**Other comments**

**Is there anything else about the population and migration statistics proposal that you wish to add to your response?**

*This consultation relates to ONS population and migration statistics for England and Wales, which contribute to the production of UK statistics.*

**Which of these geographies do you mainly use ONS population statistics for? If you use more than one, please select all that apply.**

- England and Wales
- Wales only
- England only
- UK-wide
- None of these

**Thank you for taking the time to complete this consultation. Can the ONS contact you for further information on your answers?**

- Yes  No