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1. The British Property Federation (BPF) is pleased to respond to the consultation by the Insolvency Service on changes to the method for statistics on company insolvencies.
 2. The British Property Federation is the voice of property in the UK, representing companies, owning, managing and investing in property. This includes a broad range of businesses comprising commercial and residential property owners, housing associations and financial institutions including pension funds, corporate property owners as well as a number of regional landlord associations. A list of our largest members can be found at the following link:
http://www.bpf.org.uk/en/members/our_members.php
 3. We would be delighted to provide further information on any aspect of our response on request. Please contact Sam Downes, sdownes@bpf.org.uk, 020 7802 0121.

Methodology

Question 1: Which option for counting company insolvencies do you think is best?

4. Option 2.

Question 2: Why do you favour this option?

5. It is the best compromise between accuracy and timeliness. Our members use the data to take note of themes and movements; however it is only used in this sense at a high level. The few cases that fall out of the correct time period simply do not have a significant enough bearing on the overall quantum.

Question 3: If Option 3 was implemented, what policy should we follow for revising the statistics?

- a) Revise entire time series every quarter.
 - b) Revise each quarter for N quarters after the initial estimate (so if N was 4, then the final revision for Q1 2013 statistics would be made in the Q1 2014 publication).
 - c) Make the first revision in the quarter following the initial estimate, and then make the second, final, revision for the whole calendar year in the Q2 statistics the following year.
6. N/A

Question 4: Unless Option 1 is selected, then the new method will be inconsistent with statistics published earlier. How far back in time would you require data on a consistent basis?

- a) Q1 2008 (when Companies House moved to its current administrative database)
 - b) Q1 2005 (in order to have data on a consistent basis for 10 whole years)
 - c) Earlier (please specify)
7. We have no strong opinion. Although the data is used generally by our members for themes and movements, both long term and short term, whichever option is used the comparative data from

previous years is sufficient for our members' purposes in this regard to continue to use without revising the data.

Receiverships

Question 1: Should receiverships be broken down by type?

8. Yes.

Question 2: Do you require information on the number of receiver/manager appointments?

We have no strong opinion, the proposal set out in 4.2 of the consultation seems sufficient.