CFIT | Centre for Finance Innovation and Technology

Open Property

A Roadmap for Transforming Home Buying and Selling through Smart Data

May 2026

Coalition Members

CFIT would like to offer sincere thanks to our funders and Coalition members. We are grateful to all participants for their valuable cooperation and creative solutions to the issues that we have collectively addressed.

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Chapter 1

Foreword

The UK is at a pivotal moment in the evolution of its digital economy. As set out in the Industrial Strategy, the government is committed to harnessing data as a strategic asset to drive growth and innovation across the economy.

Smart Data is the first in a package of data interventions delivering this ambition. And building on the success of Open Banking, we have the opportunity to extend Smart Data principles across the economy - unlocking innovation and productivity, improving consumer outcomes, and driving economic growth.

The government's 2035 Smart Data Vision is to create a secure, interoperable, and consumer-focused data ecosystem that drives economic growth. Delivering that ambition requires more than policy alone. It needs practical collaboration between government, industry, regulators, civil society and innovators to design, test, and implement solutions at scale.

This is where we are grateful for the work of the Centre for Finance, Innovation and Technology. CFIT's coalition model is a powerful mechanism to bring stakeholders together to accelerate innovation and translate strategic intent into practical steps for operational delivery. We are pleased CFIT agreed to apply their approach to Open Property.

The home buying process for many in the UK is often too complex, slow, and fragmented. The coalition's work applying Smart Data principles to this system demonstrates clear appetite from across the sector for a reformed system - one with reduced transaction times, lower costs, and improved transparency for consumers and businesses alike.

This report is an exciting opportunity for government and others to hear how industry wants to proceed with Smart Data, and gain insight into how thinking in the property sector can inform Smart Data innovation in other sectors as well.

The coalition's next phase - focused on prototypes, live testing, and evidence generation - is another chance for collaboration across the sector to grow. We hope to see Phase 2 make a valuable contribution to the evidence informing future policy, supporting adoption, and ensuring that the UK remains a global leader in data-driven innovation.

We have been proud to collaborate with CFIT and its partners on Phase 1 and are avidly watching its progress into Phase 2. Together, we are all working to lay the foundations for a more efficient, transparent, and innovative economy - powered by Smart Data.

Baroness Lloyd of Effra CBE
Minister for Digital Economy

> “Open Property demonstrates what becomes possible when government, regulators, and industry align behind shared purposes. This roadmap translates that collaboration into a practical pathway for change. Together with our partners, we are committed to ensuring this transformation delivers real benefits for the millions of people who buy, sell, and move home each year.”

Anna Wallace
CEO, CFIT

> “Safe and secure sharing of authenticated data delivers transparency, confidence, and better processes across the property ecosystem. Where Smart Data and trust standards are being effectively implemented, organisations are innovating responsibly, friction falls, and the experience of homebuyers and professionals improves. Delivering these interoperable and transformational standards is core to OPDA’s mission and at the heart of our membership.”

Maria Harris
Chair, Open Property Data Association

> “Verified and connected data is one of the most powerful tools for consumer protection. A Digital Property ID that establishes an authoritative record to provide a single source of truth should enable more transparent, faster transactions and ultimately reduce consumer disputes. We are committed to supporting the embedding of this capability and shaping the standards that strengthen market confidence as adoption scales.”

Lesley Horton
Chief Ombudsman, The Property Ombudsman

Chapter 2

Executive Summary

Building the Roadmap for Smarter Home Buying and Selling

The UK home buying process is constrained by structural inefficiencies: transactions take an average of 120 days and around 1 in 3 transactions fail[1]. Consumers and practitioners alike operate with limited visibility, inconsistent data standards, and fragmented access to critical information. Estate agents, lenders, conveyancers, surveyors, and intermediaries continue to work in disconnected data silos, relying heavily on manual checks, duplicated effort, and non-digital documentation. This results in delays, errors, unexpected costs, and reduced trust across the system.

These challenges point to a fundamental gap and opportunity: the absence of trusted, interoperable data infrastructure across the property ecosystem.

By enabling portable, standardised, and secure data flows between market participants, there is an opportunity to reframe the home buying journey around speed, certainty, and trust. This would reduce friction in transaction processes, improve transparency and consumer confidence, and enhance productivity across all parts of the market.

More broadly, it would establish the foundations for a modernised property and home buying market, one that is data enabled, interoperable, and better aligned with the UK's Smart Data ambition.

Open Property Coalition, Phase 1

The Centre for Finance, Innovation and Technology (CFIT) brings together Government, regulators, and industry through time-limited Coalitions to enable the collective design and delivery of shared infrastructure that can address systemic coordination failures in core markets. In October 2025, CFIT launched an 'Open Property and Smart Data' Coalition to tackle long standing inefficiencies in the UK home buying process, where fragmented data, siloed actors, and inconsistent standards continue to drive delays, cost, and failure across transactions.

Our work in the Coalition has been underpinned by cross-sector consensus, broad stakeholder and ecosystem engagement, and policy ready recommendations aligned with existing regulatory frameworks.

What this roadmap delivers

This roadmap is the output of Phase 1: a clear, execution-ready plan to operationalise Smart Data in the home buying and selling market. It defines the vision for Open Property, prioritises high-impact use cases, maps the end-to-end data ecosystem, and sets a sequenced path to implementation.

It also establishes the foundations for delivery, including a catalogue of key datasets and data holders, defined ownership of next steps, and early exploration of solutions such as a Digital Property ID, which would bring together verified data (e.g., title deeds, Energy Performance Certificates, local authority records) into

a single, shareable asset.

Given the complexity of the home buying ecosystem, the Coalition has sought to provide a coordinated framework for alignment and execution, including:

- **A clear articulation of the problem, opportunity and vision,** including the structural causes of inefficiency, the economic cost of inaction, and definitions of Smart Data, Open Property and Horizontal Digital Integration (HDI) (see Annex)
- **A defined value proposition,** demonstrating how improved data reuse delivers measurable benefits for consumers, industry, and Government, and how the approach could inform UK leadership in Smart Data (see Chapter 3)
- **A prioritised set of use cases and delivery design,** including Smart Data Clusters (as defined in the Glossary of Terms), ecosystem mapping, dataset requirements and the identification of high-impact pilot candidates (see Chapter 6)
- **A measurable outcomes framework,** setting out how success will be defined, tracked and evidenced through pilots and scaling, with baseline measurement established as part of the CFIT Coalition's Phase 2 pilot design (see Chapter 9)
- **A sequenced implementation roadmap** with a delivery model, roles and responsibilities, and a consolidated set of immediate next steps (see Chapter 8)
- **Ten recommendations** for coordinated action across Government, industry, and regulators (see Chapter 10)

Together, these elements provide a coherent foundation for moving into delivery, in alignment with the direction of travel for UK Smart Data more broadly

What success looks like

Success is defined by trusted reuse of information across participants and greater system connectivity across the Smart Data value chain, rather than siloed digitisation within individual stakeholder groups.

This roadmap sets out a measurable framework focused on:

- Reduced transaction timelines and rework
- Lower fall-through rates and earlier issue resolution
- Improved provenance, auditability and fraud resilience
- Greater transparency and confidence for consumers

Key recommendations

This roadmap sets out ten core recommendations for Government, regulators, and industry, developed collaboratively with Coalition partners.

Delivering against this roadmap requires coordinated action across all stakeholders. The following priorities are grounded in the analysis and delivery model outlined in this report:

1. **Evidence led pilots –** Run Phase 2 pilots to demonstrate live use of Digital Property ID (or comparable solutions) in home buying, while testing commercial models for emerging roles, using measurable outcomes (e.g., time, cost, failure rates) to inform scaling and policy.
2. **Regulatory sandbox –** Deploy a cross-regulator sandbox to test data sharing, consent, and interoperability in a controlled environment, which reflects current regulatory parameters.
3. **Transaction and milestone visibility –** Standardise milestone tracking and enable permissioned data sharing to improve end-to-end transparency and coordination for stakeholders across the entirety of the home buying value chain.
4. **Consumer trust –** Embed clear consent, transparency, and control mechanisms into Smart Data, and Open Property user journeys to ensure sustained consumer confidence and adoption.
5. **Property identification –** Align existing property identifiers (e.g., UPRN, Title Numbers, etc.) within a shared property model to enable consistent referencing of properties and land assets across systems.
6. **Upfront digital property data –** Standardise and require earlier disclosure of a wider set of key property information to improve transparency, reduce uncertainty, and lower transaction fall-through risk.
7. **Technical standards –** Agree minimum interoperability standards to enable consistent, reusable data exchange across participants.
8. **Trust framework–** Establish shared trust, roles, and assurance mechanisms to enable reliable data reuse at scale.
9. **Standards alignment –** Coordinate cross-government and industry standards to provide clarity, safety, and consistency for Smart Data regulation.
10. **Smart Data governance –** Create a coordinated governance layer to align delivery, standards, and implementation across the ecosystem.

These recommendations are detailed further in Chapter 10, including delivery responsibilities and supporting evidence.

Chapter 3

Where Home Buying is Headed

Home Buying Today

Around 1.1 million residential properties are bought and sold across the UK each year, in transactions worth a combined value of nearly £380 billion[2]. For most households, buying a home represents the single largest financial commitment they will ever make, with the average property in England now costing 7.6 times median annual earnings and considerably more in London and the South East. Across England and Wales, HM Land Registry safeguards records of property ownership worth nearly £9 trillion, supporting more than £1.6 trillion in personal and commercial lending secured against property.[3, 4] The effective functioning of our housing market matters to the wider economy, yet the transaction process through which it operates continues to erode consumer confidence.[5]

In England and Wales, the home buying process is notoriously long, arduous, and stressful, with the average transaction taking 120 days, and with around 1 in 3 transactions falling through. This is often a consequence of siloed data, inconsistent standards, and opaque analogue practices, which complicate each stage of the transaction. The Open Property Data Association (OPDA) estimates that less than 1% of the data required to buy a home is available in digital format.[6] That increases delays, duplication, errors, and the risk of fraud every time information is reshared by prospective homeowners to their estate agents, mortgage brokers, lenders, surveyors, and conveyancers. Together, these complexities contribute to failed transactions.

The personal cost of failed transactions

Drawing on independent economic analysis and a nationally representative survey of over 2,000 consumers, research found that 54% of buyers experienced constant or frequent stress throughout the home buying process, with fewer than half reporting feeling positive at any stage.[7] Among those whose transactions collapsed, nearly two thirds reported elevated stress, over half reported heightened anxiety, and a quarter experienced strain on personal relationships. Around 85% of those involved in a failed transaction suffered some form of financial loss, at an average cost of £1,240 per failed transaction and with one in five losing more than £2,000.[8] More than one in four recent buyers said the experience had left them less likely to move again, while 88% said a more streamlined process would make them more willing to transact in future.[9]

In short, home buying today deters potential participation in a market worth hundreds of billions of pounds, compounding housing misallocation, reducing labour mobility, and constraining the economic activity that a well-functioning property market should support.

The macroeconomic cost of failed transactions

These inefficiencies impose significant costs on consumers and the wider UK economy. Around 530,000 transactions fail each year in England and Wales, costing our economy approximately £950 million, while fall-through fees alone cost consumers around £560 million annually.[10] The resulting uncertainty also discourages housing mobility, leading to inefficient use of the UK's housing stock, and increases exposure to fraud risks such as identity theft and payment diversion. At its core, the home buying and selling system remains slow, uncertain, and costly because trusted information cannot be reused across the transaction cycle. Key data relating to the property, the parties, and the transaction is repeatedly requested, recreated,

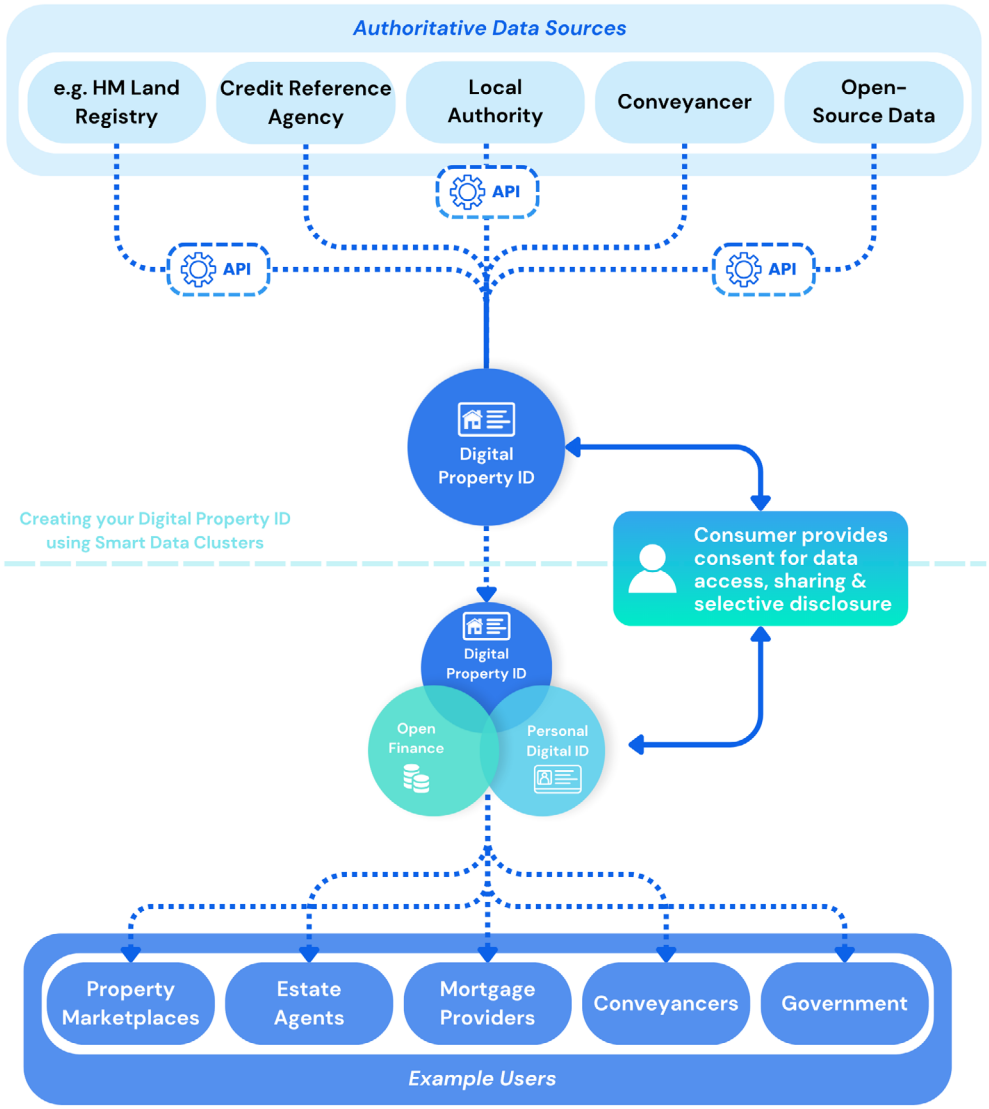
and verified by multiple actors – including estate agents, conveyancers, lenders, surveyors, and public bodies such as HM Land Registry and local authorities.

Despite significant investment in digitisation across lenders, conveyancers, estate agents, and data providers, the current fragmented model continues to drive delay, duplication, and avoidable failures.

Home Buying Tomorrow

We foresee a future home buying system built on trusted, reusable data that replaces today's fragmented, manual process with a coordinated, near real-time flow – faster, clearer, and more certainty for consumers.

This model combines Property ID, verified personal or corporate identity, and affordability data to confirm the property, verify the parties involved, and ensure buyers can afford the asset before transactions progress too far. By front-loading verification and ensuring high-quality data is available early in the process, unnecessary effort is reduced across all parties.



The result is less wasted transactions, fewer surprises, and stronger fraud prevention, which leads to a significant reduction in fall-through rates and a more efficient, trustworthy home buying process.

The Future State of Home Buying

Stage of Home Buying Journey	What the Digital Property ID enables	Benefits
1 Pre-Listing	Buyers are pre-qualified before searching for their dream property	More trust between buyers and sellers, greater confidence in the process, and buyers who feel in control from day 1
2 Property Marketing & Buyer Discovery	1. Buyers see homes within their affordability, and that match their preferences 2. Buyers and sellers are verified by personal or corporate ID 3. Listings are pre-verified and updated in real-time by the Digital Property ID 4. Risks are surfaced early	1. Better alignment of property listing results to buyer profiles and property search queries 2. Fraud risk, identity misuse and payment diversion are reduced 3. **a)** Accurate, trusted and complete information from the outset. **b)** Buyer confidence built early in the journey 4. Greater transaction certainty and lower fall-through rates
3 Offer & Acceptance	1. **a)** Mortgage is underwritten in near real-time using trusted, reusable property data. **b)** Mortgage offers could be shared via property listing platforms 2. Mortgage offers could be accepted with the support of a broker/advisor or independently 3. Real-time progress updates provided	1. No mortgage in principle needed 2. Faster financing decisions e.g. proof of source of funds. 3. Consumers are equipped with everything they need upfront to make a confident, informed decision about whether to proceed

Stage of Home Buying Journey	What the Digital Property ID enables	Benefits
4 Legal & Financial Preparation	1.End-to-end digital conveyancing 2.Greater auditability of the transaction and negotiation process 3.Standardised (Law Society approved) contracts pre-populated with trusted data from the Smart Data Pack	1.**a)** Transactions reduced from months to weeks **b)** Lower legal fees due to a more efficient conveyancing market **c)** Simplified legal complexity 2.Greater transparency and accountability from stakeholders in the process 3.Lower stress for consumers
5 Exchange & Completion	1.Funds are released automatically 2.Digital signatures backed by Digital IDs 3.Reliable completion date	1.**a)** Reduced payment delays. **b)** Increased certainty of transactions and less surprise fall-throughs 2.Easier understanding and engagement for buyers 3.Buyers can pre-emptively take steps towards moving into their new home
6 Post-Completion	1.A single source of truth for all parties 2.Disputes resolved via transparent data audits 3.The Digital Property ID passes onto the new owner	1.**a)** Risks are identified early. **b)** Greater visibility, confidence and control for buyers 2.Smart Dispute Resolution (SDR) enabled (e.g. with The Property Ombudsman) 3.All information in one place

Beginning of the Journey

In the future buyers and sellers could be seamlessly pre-verified and qualified at the start of the journey. With consent, buyers could selectively verify and share their status to be able to proceed with the transaction. With consent, sellers could prove the core attributes and property conditions, lowering the risk of transactions failing at later stages.

Property listing platforms could use Smart Data to bring these benefits together through an integration of trusted property data enabled by a Digital Property ID. This would increase the reliability of listings, strengthen consumer trust, improve market efficiency, and support smoother transactions.

Mid way through the Journey

Because both buyers and sellers are verified through secure digital identity and financial checks, the risk of fraud, identity misuse, and payment diversion is significantly reduced across the transaction.

Mortgages can be underwritten in real time (directly or via property marketplaces) without the need for a traditional mortgage-in-principle, enabling faster financing decisions and a more confident, lower-stress experience for buyers. With trusted data in place, lending, legal, and administrative processes can run in parallel rather than sequentially, reducing delays and uncertainty.

With clearly defined roles, milestones and status updates, participants across the home buying journey would have real-time progress visibility across the chain. This approach enables consumers to plan every aspect of the home buying journey, which could reduce friction and delay.

End of the Journey

When parties are ready to exchange, contracts are pre-populated from trusted data, simplifying legal complexity and making the process easier to understand and engage with. Funds are released automatically on completion, reducing payment delays and increasing certainty that transactions will close smoothly.

Post Journey

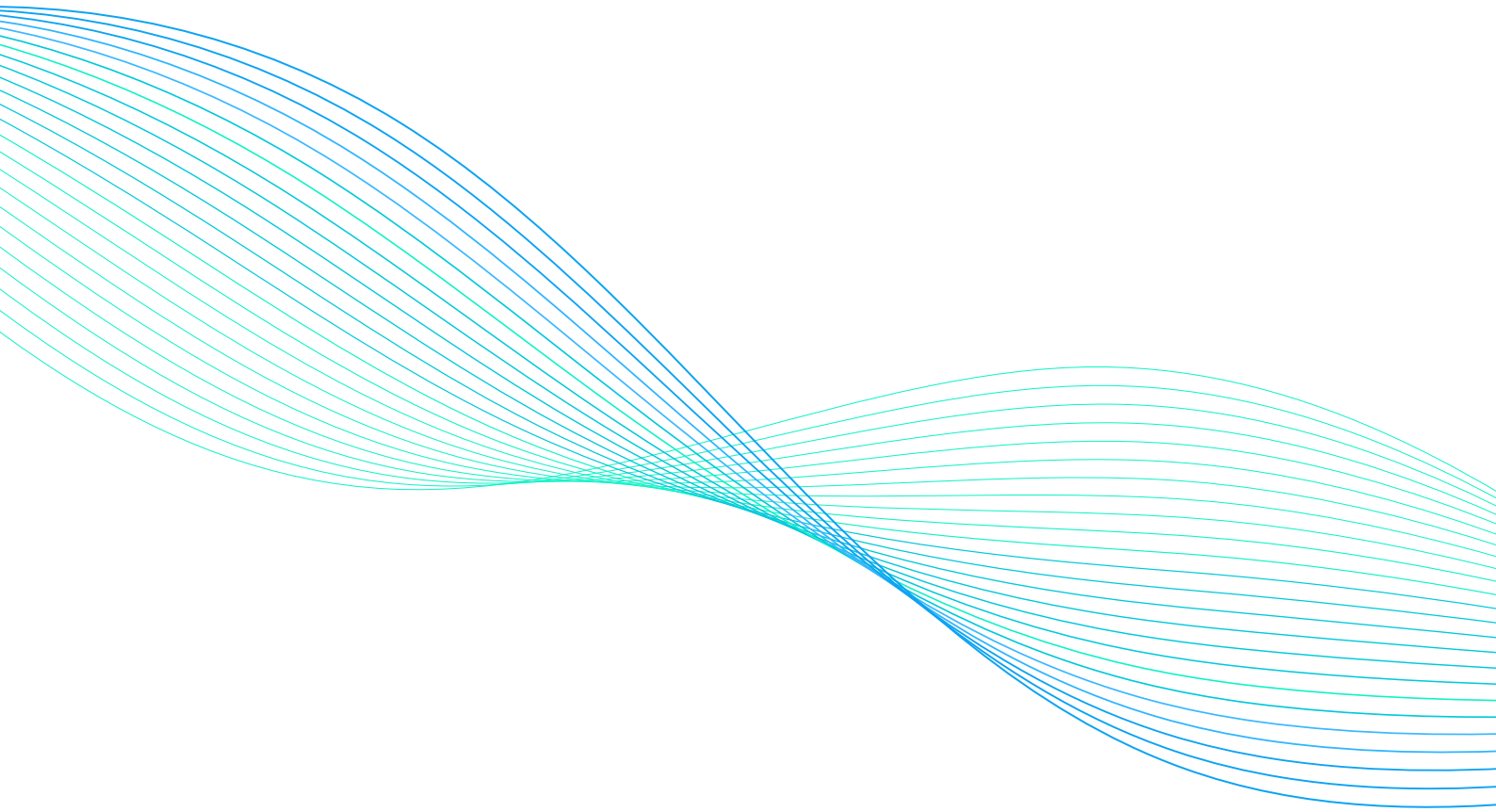
Risks are identified early and disputes resolved through transparent data trails, helping consumers to avoid last-minute surprises, delays, or unexpected costs. Throughout the journey, all parties operate from a single, consistent source of truth, giving buyers greater visibility, confidence, and control. Where problems occur after the sale, organisations like The Property Ombudsman (TPO) could be granted consent to new forms of data with an end-to-end audit trail of the home buying journey, giving rise to the potential of '*Smart Dispute Resolution*'.

Desired Future Outcomes:

In setting up the Coalition, the Department for Business and Trade (DBT) and CFIT envisioned these outputs of the Coalition's work to help drive the following outcomes to home buying and selling:

- Consumers understand, in plain language, what matters, what is outstanding and what risks exist with clear visibility of where they are in the journey and what actions are required next

- Real-time completion timelines for buyers and sellers, with continuous visibility of transaction progress and outstanding actions
- Estate agents can list better-quality upfront information and fewer downstream surprises, improving buyer confidence and reducing fall-through risk
- Conveyancers and lenders can rely on verified information rather than re-requesting evidence, with routine checks increasingly automated so professionals can focus on judgement, advice, and complex cases
- Checks that currently take days or weeks can be accelerated for specific components where appropriate, as trusted data can move securely across organisations
- The market becomes more predictable, resilient and fraud-resistant, supported by stronger provenance signals, transparent permissions, and improved data accuracy
- An end to gazumping and gazundering, through a faster, fairer, and more transparent process
- Reduced transaction fees in a more competitive and efficient conveyancing market
- A persistent digital identifier for every property, anchored to an up-to-date record of its attributes
- Improved mortgage underwriting, informed by the risk profile of both property and buyer
- Faster verification of source of funds, replacing the traditional 'mortgage in principle'
- More secure disbursement of funds at completion



Chapter 4

CFIT Open Property and Smart Data Coalition

Chapter 3 set out why the UK home buying market requires reform. This chapter turns to the institutional response. It explains the rationale for CFIT's appointment, what Open Property means as an applied concept, and why the present alignment of policy, infrastructure, and Government agenda makes Phase 2 a workable proposition.

DBT commissioned CFIT to convene a Coalition of relevant businesses and bodies to develop a strategic roadmap for progressing towards an Open Property Smart Data Scheme, with home buying as the flagship use case. Coalition participants have included representatives from high street and specialist lenders, national and regional conveyancing firms, estate agency groups, PropTech and data providers, search providers, surveyors, and public bodies including HM Land Registry. This breadth of participation has been important in surfacing barriers and opportunities that span the full home buying and selling journey rather than reflecting any single part of the market.

Why CFIT was Selected

CFIT was selected for its proven track record in translating complex financial and data infrastructure from strategy into delivery through cross-sector coalitions, standards development, and live pilots.

We have led national industry-wide programmes across SME finance, Digital Identity, and Open Finance, convening Government, regulators, and industry to address the £22bn SME credit gap, support HM Treasury-commissioned Digital Identity work, and our experience of extending Open Banking to a projected £30.5bn Open Finance opportunity.[11]

Across these flagship initiatives, CFIT has consistently converted policy ambition into scalable, real-world solutions through Coalition leadership, trusted frameworks, and practical implementation.

What is Open Property?

Government is committed to supporting the development of an Open Property ecosystem and has published a Smart Data Strategy[12], with home buying and selling as the primary use case being explored. DBT leads the Smart Data programme; the Ministry of Housing, Communities and Local Government (MHCLG) leads the home buying and selling reform programme; and HM Land Registry holds core data on property ownership and title. Improving how trusted information flows across the property ecosystem supports both economic productivity and market transparency.

Open Property is a valuable opportunity for the UK to demonstrate leadership in cross-sector digital transformation by showing how Smart Data principles can be applied in a real-world market that is complex, regulated, and multi-party. If delivered well, the lessons and repeatable patterns could successfully inform:

- How to align incentives across multiple private and public sector participants
- How to establish interoperable standards and trusted data reuse without removing competition

- How to strengthen consumer outcomes while enabling financial innovation
- How Smart Data can support economic growth in alignment with the UK's Modern Industrial Strategy

Open Property is the application of Smart Data principles to the property sector. This Coalition is looking at home buying and selling as the flagship use case.

Why now?

The case for Open Property is strengthened by the convergence of delivery readiness, consumer protection expectations, and the Smart Data direction of travel. There is now an opportunity to use this momentum to assess the benefits and consequences of a coordinated Smart Data approach for property through Phase 2.

- **DBT's Smart Data Strategy** signals that schemes must be delivered through defined governance functions, conformance framework, and cross-scheme coordination. Open Property should align to this scheme pattern as it matures. MHCLG is expected to publish its own roadmap in 2026 on how Government will transform home buying and selling over the course of this parliament and has commissioned research to investigate what its role could be in delivery. In parallel, HM Land Registry is working with nine local authorities on pilots to understand the impact of improving access to key property data used in the home buying and selling process, with outcomes expected to inform next steps on digitising locally held priority data.
- **Digital maturity across the sector** has reached a level where coordinated change is now practical. Investment in digital systems by lenders, conveyancers, estate agents, and data providers means the underlying infrastructure to support trusted data reuse is more widely in place than at any previous point. What has been missing is not digitisation itself, but the coordination layer that connects these capabilities across the journey. Open Property is designed to provide that coordination.
- **MHCLG's home buying and selling reform programme** creates a timely policy backdrop. Open Property could offer a practical route to support the adoption of digital home buying processes and the direction of travel on upfront property information through trusted, reusable information flows built on verified data and clear provenance, rather than additional document burden.
- **Digital identity and trust frameworks:** Department for Science, Innovation and Technology's (DSIT) Digital Verification Services (DVS) Trust Framework, established under the Data (Use and Access) Act, provides a reference point for how digital identity and attribute sharing can be governed and trusted, which is relevant to permissioning, assurance, and reliance within Open Property.
- **Consumer protection and transparency pressure:** broader legislative and regulatory policy development continues to move towards clearer expectations on transparency and consumer protection, increasing the need for auditable, defensible information flows, and earlier disclosure.

Setting the Foundations for Wider Smart Data Adoption

While focused on home buying and selling, the approach is intentionally designed to support broader applications over time: other property lifecycle use cases (remortgage, maintenance and resale) as well as future cross-sector Smart Data applications (finance, digital markets, energy, and transport).

By demonstrating how trusted, interoperable data sharing can operate in a complex, multi-party market, Open Property can provide a repeatable model for scaling Smart Data across the UK economy.

Smart Data refers to the secure access, sharing, and reuse of verified information by authorised parties, with clear provenance, permissions, and accountability within a governed framework. Open Banking, the UK's first ever Smart Data scheme, enables consumers to share financial data with authorised third parties through a consent mechanism, currently overseen by Open Banking Ltd and regulated by the Financial Conduct Authority (FCA) and Payment Systems Regulator (PSR).

Open Property builds on this model, applying Smart Data principles to the property sector to enable more efficient, transparent, and trusted data use across the sector. It is a term coined to refer to the application of Smart Data principles to the property sector.

Economic analysis of Smart Data use cases, published in the Public Service Consultants (PSC) modelling report[13], indicates that digital information in a Smart Data scheme for home buying could deliver approximately £14.1 billion in net social value over 15 years, with a benefit-cost ratio of around 9.8.[14] Across sectors, Smart Data use cases are estimated to generate £26.3 billion in net social value and contribute approximately £3.6 billion annually to GDP by 2043, with home buying identified as the highest-value use case.[15]

Open Property is therefore a coordination project. It is designed to be applied first to home buying and then replicated across the wider Smart Data agenda. Realising it means confronting a set of long-standing structural impediments, which the next chapter sets out.

Chapter 5

Barriers to Success

If Chapter 4 made the case for Open Property, this chapter sets out what stands in its way. The barriers below are structural rather than incidental. These systemic hurdles have persisted despite years of digital investment across the sector, and they reinforce each other in ways that defeat piecemeal solutions.

The Coalition identified a consistent set of barriers that prevent trusted data reuse at scale across the property ecosystem. These barriers are structural and interdependent, spanning technical, legal, regulatory, and coordination dimensions.

Technical Barriers

- **Fragmented data models and formats:** many systems are designed for document exchange rather than structured, reusable data with lifecycle management, limiting consistent reuse across participants
- **Lack of trusted mechanisms to share data reliably:** resulting in repeated requests for the same information across participants
- **Inconsistent identifiers and matching:** while identifiers such as UPRN exist, their application and linking across datasets is not always consistent, and matching approaches vary across participants
- **Limited digitisation in parts of the ecosystem:** some participants and datasets remain partially or fully analogue, creating bottlenecks in otherwise digital workflows

Legal and Liability Barriers

- **Unclear reliance and liability boundaries:** participants lack clarity on when they can rely on upstream data and who is accountable if that data is incorrect
- **Absence of standardised trust roles:** roles such as data holder, verifier, and relying party are not consistently defined across participants, leading to duplicated verification
- **Risk-averse behaviour by design:** in the absence of clear legal and reliance frameworks (e.g., agreed rules and methods that allow participants to rely on information from other parties using a structured approach), organisations often default to re-checking as a risk-control mechanism

Policy Barriers

- **Fragmented oversight across multiple bodies:** oversight responsibilities are distributed across multiple regulators and Government departments, resulting in coordination fragmentation
- **Lack of consistent cross-scheme governance:** without alignment to broader Smart Data frameworks, there is a risk of divergent standards and trust models

- **Unclear conditions for intervention or mandate:** there is currently no defined threshold for when voluntary adoption is insufficient and regulatory intervention is required

Market and Coordination Barriers

- **Misaligned incentives across participants:** current benefits are not sufficient for stakeholders to justify investing in shared infrastructure
- **Standards and framework fragmentation:** multiple overlapping initiatives evolve in parallel, with limited mechanisms for convergence
- **Lack of formal trust and assurance framework:** limits the ability of participants to rely on shared data at scale
- **Limited cross-market coordination:** while coordination initiatives exist, sustained cross-market alignment at scale remains limited
- **Adoption and participation risk:** benefits depend on coordinated multi-party engagement, which is difficult to achieve without clear value signals and incentives

Public Data and Infrastructure Barriers

- **Access, quality and freshness of public data:** there is variability in access, quality, and freshness across datasets and custodians (e.g., HM Land Registry, local authorities), limiting consistent reuse
- **Inconsistent update cycles and data quality:** variability in how public data is maintained reduces confidence in reuse
- **Operational constraints in public bodies:** delivery capacity, funding and legacy systems limit the speed of change

In short, these barriers cannot be overcome by optimism alone. Removing them requires careful in-depth analysis of where reuse breaks down today and where regulatory intervention would deliver the greatest return. The next chapter sets out the Coalition's findings on those key questions.

Chapter 6

Coalition Findings

The Coalition examined where data reuse breaks down across the home buying journey, why it breaks down, and where targeted regulatory intervention would deliver the greatest return. The findings cover the research methodology, how data creates value, the top prioritised use cases, the dataset mapping, and the front-runner pilot set that informs the implementation roadmap.

Coalition Methodology

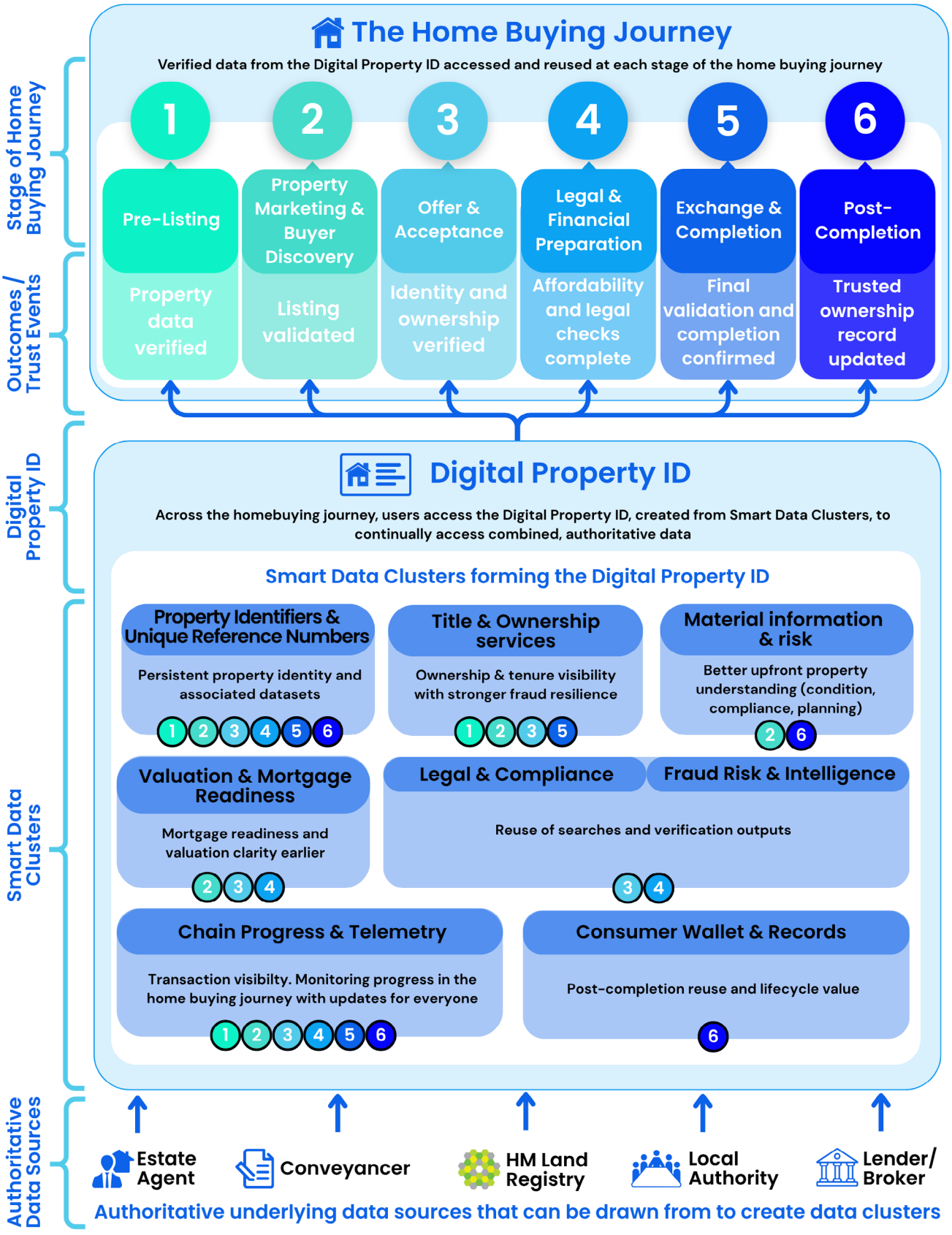
CFIT brought together a Coalition from across the home buying ecosystem, including lenders, conveyancers, estate agents, PropTech providers, data providers, and public bodies. Through a structured programme of workshops, data mapping, use case development and prioritisation, the Coalition assessed where data fragmentation creates the greatest friction in the transaction process and where Smart Data could deliver the most value. This chapter sets out the Coalition's highlighted findings. It covers:

- where and why data reuse breaks down today
- the key barriers to implementing Smart Data at scale
- the priority use cases with the highest potential impact
- the data, standards, and ecosystem foundations required to enable delivery

These findings form the basis for the pilot design and implementation roadmap set out in subsequent chapters.

The Coalition set out to translate the vision and value proposition into a practical delivery design, including what could be built, how it could be structured, and how it could be tested through pilots.

Enabling Trust and Reuse Through Structured Property Data



Open Property creates value when participants can rely on reusable, verified information rather than repeatedly assembling evidence and re-checking the same facts. Coalition inputs (e.g., market research, stakeholder surveys, focus groups, and bilateral meetings) indicate that the highest-value opportunities tend to sit at hand-offs, where inconsistency, duplication, and limited trust signals cause delay, rework, and late-stage surprises.

Findings from Coalition's sprint programme and research survey to Coalition partners reinforced that reuse often breaks down because roles are inconsistently defined across the journey,[16] resulting in unclear reliance and repeated checks. This roadmap sets out core roles and responsibilities that will need to be defined in future work.

A practical Open Property approach focuses on "priority data exchanges": defined packets of information that are frequently re-requested today and can be made reusable through consistent structure and visible provenance. In Coalition discussions, these exchanges were described as Smart Data Clusters. These represent coherent sets of data attributes that define what information is required, how it should be structured, and what trust signals must travel with it. These groupings are intended to support interoperability and reuse and should not be interpreted as prescribing a specific implementation architecture.

These exchanges should be selected where:

- the same information is requested multiple times across the journey
- trust, provenance and freshness are the main barriers to reuse
- standardisation and shared trust signals produce measurable benefit (e.g., time saved, rework avoided, certainty improved, and risk reduced)
- roles and responsibilities for issuing, verifying and relying on the information can be made explicit, so that accountability is clear and auditability supports safe reuse

Coalition discussions have refined the concept of Smart Data Clusters as the practical unit of reuse. In delivery terms, these groupings are expected to become pilot schemas and interfaces that can be implemented consistently across participants. The roadmap assumes that groupings should align to cross-scheme Smart Data principles where possible (e.g., consistent trust markers and assurance expectations), while allowing property-specific extensions as evidence emerges through pilots.

Recurring themes from the Coalition emphasise the need for persistent, reusable data that can be refreshed and reused across stages, rather than recreated each time. Each reusable data exchange should carry signals that tell the receiving party what the data is, who provided it, when it was last checked, and whether it is still valid. These signals known as lifecycle trust events (e.g., issued, verified, updated, expired or revoked) allow authorised participants to decide whether they can safely rely on the information without re-checking it.

This metadata is visible only to parties with permissioned access to the exchange, not to all users.

These shared data foundations enable:

- **Composable exchanges:** reusable Smart Data clusters become modular building blocks that different participants can use across transactions, replacing bespoke data transfers and duplicated integrations
- **Fewer re-checks:** lifecycle trust events travel with the data so that participants can rely on prior verification to prevent repeating checks by default
- **Permissioned reuse:** consistent consent and delegated consent patterns allow authorised sharing of verified information while maintaining consumer control and auditability
- **Cross-scheme portability:** alignment with wider Smart Data scheme patterns reduces fragmentation and lowers onboarding costs as organisations participate across multiple sectors

- **Evidence-led improvement:** instrumentation and metrics link exchanges to measurable outcomes (e.g., time saved, reuse rates, and reduction in rework), enabling iterative improvement and scaling over time

Open Property builds on existing standards and capabilities instead of replacing them. It enables innovation at the edge of the ecosystem, allowing providers to differentiate through service quality, and user experience provided they meet shared conformance and assurance expectations.

Use Case Landscape

Through Coalition's work to date, a clear picture has emerged of where data friction sits in the home buying and selling journey, what foundations are required to enable reuse, and which use cases offer the strongest combination of impact, feasibility, and ecosystem value.

As part of this work, use cases have been grouped into Smart Data Clusters. These groupings describe reusable sets of attributes and how they travel across the ecosystem. In Phase 2 pilots, they are likely to translate into schemas, interfaces, and validation patterns, without prescribing a specific technical architecture.

Data Mapping (Custodians and Flows)

The Coalition mapped essential data required for home buying and selling.[17] The results of this work reinforced that the challenge is therefore not the absence of data, but fragmentation across custodians and inconsistent transfer of information at key hand-offs. Across journey stages, Coalition surfaced the following principal sources and custodians of information.

Journey stage	Representative data sources and custodians
Pre-listing	HM Land Registry; GeoPlace; Local Authority; Estate Agent; Conveyancer; ID/AML (Anti-Money Laundering) providers; EPC Register; Valuation Office Agency
Property marketing and buyer discovery	HM Land Registry; Estate agent/seller
Offer and acceptance	ID/AML providers; Lenders; Credit reference agencies; Estate agent; Conveyancer
Legal and financial preparation	HM Land Registry; Lenders; Credit reference agencies; Local Authority; Environmental data providers (e.g., Environment Agency); Conveyancer; Surveyor
Exchange and completion	Lenders; HM Revenue & Customs; Estate agent; Conveyancer
Post-completion	Local Authority; HM Land Registry; HM Revenue & Customs; Conveyancer

This mapping underlines why the highest-value opportunities sit at the hand-offs: participants repeatedly need the same facts, but cannot reliably reuse them due to inconsistent structure, limited provenance, and unclear reliance.

Existing Standards and Frameworks

The Current Open Property Policy Landscape

- **The statutory and strategic framework is now in place.** The Data (Use and Access) Act 2025 provides the statutory basis for UK Smart Data schemes. In March 2026, DBT's Smart Data Strategy identified property as one of ten priority sectors and estimated that home buying and selling could unlock £14.1 billion in net social value between 2028 and 2043 the single highest-value Smart Data use case identified. DBT also committed to a property-sector call for evidence in 2026 and to publication of a cross-economy Smart Data Guidebook by early 2027. MHCLG's consultations on home buying and selling reform and on material information in property listings closed on 29 December 2025. A policy roadmap is expected in 2026, with primary legislation expected to follow. The broad shape of the property Smart Data scheme, and the conformance expectations it will embed, is therefore likely to be determined within this window.
- **The standards and trust architecture is being authored at industry level.** The UK property data ecosystem contains multiple overlapping standards and frameworks, including OPDA's Property Data Trust Framework (PDTF), the RICS Data Standard, OSCRE, and ISO 20022. Phase 1 identified this fragmentation as a key barrier to trusted data reuse at scale. PDTF is emerging as an industry standard adopted by LMS's National Property Transaction Network, Coadjute, Moverly, Movera and PEXA UK. The Digital Property Market Steering Group (DPMSG) is now leading the governance work. In parallel, the CLC-sponsored Smart Property Data Trust Framework sandbox, delivered through a partnership between OPDA, Raidiam and the CLC, is testing that architecture technically. The sandbox runs until October 2026 and is expected to publish recommendations intended to guide Smart Data adoption across the wider economy.
- **Digital identity and verification are comparatively mature.** DSIT's DVS Trust Framework provides the statutory identity layer for property Smart Data. HM Treasury and DSIT jointly confirmed that certified DVS providers satisfy the identity-verification requirements contained within Money Laundering Regulations. The identity backbone is therefore effectively in place. The unresolved question is how property-specific trust events, reliance conditions and liability boundaries are layered on top of it.
- **The financial services component is now beginning to take shape.** The FCA's Open Finance Roadmap identified consumer mortgages and SME lending as the first two priority use cases. The SME, mortgages, and Open Finance Sprints concluded between late 2025 and early 2026, delivered with Raidiam as technical partner, tested reusable data packages for loan applications. The property Smart Data scheme will intersect with financial services primarily through mortgage underwriting, affordability assessment, and Source of Funds verification. These are among the highest-value use cases identified within DBT's evidence base, and they sit at the boundary between the DPMSG's remit and that of the FCA.

Where the Coordination Gap Sits

In terms of direction of travel, the workstreams described above are broadly aligned. Each recognises the Unique Property Reference Number (UPRN) as the authoritative property identifier, treats the Property Data Trust Framework (PDTF) schema as a credible standard for upfront property data, and relies on the DVS

trust framework for identity assurance. Collectively, they identify home buying and selling as the flagship use case for Open Property.

MHCLG, DSIT, and HM Land Registry are all participants in the DPMSG. As a result, there is now a substantial degree of consensus across the property sector.

What is not yet in place is the conformance framework capable of turning that alignment into something to which the secondary legislation can meaningfully refer. Three areas remain insufficiently coordinated, and each will need to be resolved during the period between the 2026 call for evidence and publication of the 2027 Smart Data Guidebook.

- **An overarching conformance framework has not yet been defined across the ecosystem.** Multiple standards already exist, and each serves a legitimate purpose. What the Smart Data Guidebook will expect is a unified conformance layer against which those standards can map, with formally defined trust roles, trust events and reliance conditions. At present, no organisation is integrating such a framework at the scale the Guidebook will ultimately demand.
- **The legal, liability and reliance architecture remains unresolved.** A property Smart Data scheme will require a settled legal position on when participants are entitled to rely on upstream data, and where accountability rests when data proves inaccurate. It will also require consent and permissioning models capable of supporting delegated consent, together with data-sharing agreement templates that enable safe reuse across Coalition members. These issues are identified in the TPXimpact report and implicit in the sandbox design. However, they have not been developed into a form capable of being operationalised through secondary legislation.
- **The property and financial services conversations are being run separately.** Yet many of the highest-value use cases, particularly mortgage decisioning, sit precisely at the boundary between the DPMSG's remit and that of the FCA. The FCA is not a member of the DPMSG, and the DPMSG has no formal standing in relation to the Open Finance Roadmap. Bringing lenders, credit reference agencies and the FCA to the same table as HM Land Registry, OPDA, the conveyancing professions and local authorities requires convening authority across both domains. Currently, there is no established forum (outside of CFIT) in which that cross-sector coordination happens as a matter of course.

Standards and Models

These gaps will matter when the property secondary legislation is drafted. Whichever bodies close them in the current window will shape what the legislation asks of industry and how the Smart Data Guidebook treats property in early 2027.

The Coalition reviewed the standards and frameworks already in play and emphasised that Open Property should build on existing momentum while maintaining equal access and avoiding endorsement of any single privately owned standard.

Standards and models currently in circulation include (but are not limited to):

- OPDA's Property Data Trust Framework (PDTF)
- UPRN and USRN
- ISO 20022 Payments Standard
- RICS Data Standard
- OSCRE (Open Standards Consortium for Real Estate) and UK housing data standards

Again, these standards address different aspects of the property data landscape and there is some overlap in scope. At a high-level, the core standards can be grouped by their function:

- **Data attribute standards** (what information is structured and how): the PDTF (as described in Chapter 7, key enablers) is the most developed example in the property sector, defining how property data attributes should be structured and presented. RICS and OSCRE standards also cover property data attributes, with varying degrees of overlap in scope
- **Consent and authorisation flow standards** (how permissioned access works): the Open Banking/Raidiam model provides a proven pattern for consent-led data sharing at scale, with relevance to how Open Property may approach permissioned reuse of verified information
- **Commercial data and search standards** (how market data is packaged and delivered): providers such as Landmark Information Group have established models for packaging and delivering property search data, representing a commercial data layer that sits alongside public data sources

Implementation barriers highlighted by the Coalition include:

- Digitisation shortfalls across parts of the ecosystem
- Fragmented adoption of available standards
- Data model inconsistencies between participants
- Limited coordination across Government departments on data access and quality

Where these standards overlap – for framework here both PDTF and RICS define property attributes, or where consent patterns need to work across both public and commercial data sources – a consolidation path will be required to prevent fragmentation and enable reliance at scale. Any Open Property pilots should test how these standards can be reconciled in practice to enable a fair selection when consolidating multiple data sources.

What Must Happen Next

In the next phases of development for the sector, a dedicated delivery vehicle will be required to develop the conformance architecture needed to address the three gaps identified in Chapter 6. Its purpose, consistent with the delivery plan, should be to establish an overarching conformance and interoperability framework capable of accommodating existing standards, while creating the conditions under which market selection can determine which standards ultimately prevail over time.

- **Map and assess the existing standards landscape.** Catalogue the existing standards, schemas and framework artefacts across the ecosystem, including PDTF, the RICS Data Standard, OSCRE and ISO 20022. Assess their coverage, maturity, adoption and gaps against the Smart Data Clusters defined in the roadmap. Identify where convergence is achievable, and where competing approaches continue to serve legitimately distinct operational or market needs.
- **Define the interoperability and conformance framework.** Specify the overarching conformance expectations against which multiple standards can map. Establish a formal trust framework, including trust roles (issuer, holder, verifier and relying party), trust events (issued, verified, updated, expired and revoked), reliance conditions, audit requirements and assurance expectations. Align the framework with the direction of travel set out in the DBT Smart Data Guidebook. Define consent and permissioning models, including delegated consent mechanisms. Obtain legal opinion on liability allocation and reliance boundaries, and develop standardised data-sharing agreement templates capable of supporting safe reuse across participants.
- **Align with Government and regulatory direction.** Coordinate with DBT, DSIT and HM Land Registry on standards, governance and regulatory alignment. Ensure the framework aligns with

the direction established by MHCLG following the outcome of its consultations, and engage the FCA where use cases intersect with mortgage lending or broader Open Finance objectives. Support cross-regulator sandbox activity where questions relating to data sharing, consent, liability and reliance require coordinated resolution. Define the conditions under which regulatory mandate backstops may become necessary should voluntary adoption prove insufficient.

Moving from Use Cases to Implementable Pilots

The Coalition's work assessed the current state of trust framework development in the sector (see Key Enablers). While important enabling components exist - including emerging standards artefacts, digital identity capabilities and consent-led sharing patterns from other Smart Data schemes - these have not yet been coordinated into a formal trust framework that consistently defines roles, reliance conditions and assurance expectations across the end-to-end journey.

Trust events are lifecycle signals – such as issued, verified, updated, expired or revoked – that accompany reusable data and allow downstream parties to assess whether it can be relied upon for the purpose at hand.

Enabling foundation	What this means in practice for Phase 2 pilots
Trust and governance framework	Agree a formal trust framework that defines roles and responsibilities (as set out in Annex) and clarifies what participants can rely on, under what conditions.
Minimum viable data scheme and Smart Data Clusters	Define minimum viable groupings, core attributes and consistency rules so reusable exchanges can be implemented and tested quickly without over-engineering.
Standard trust events and attribute applicability	Define trust events and lifecycle behaviour (issued, verified, updated, expired, revoked), including propagation and notification expectations where required.
Alignment with FAIR principles	Improve findability, accessibility, interoperability and reusability (FAIR), particularly for public-sector-originated data, and embed formal roles into the journey.
Legal risk and compliance alignment	Normalise legal constructs and compliance expectations (e.g., reliance, liability boundaries), so reuse does not default back to duplication and bilateral workarounds.

These should be treated as enabling foundations for the use case set, rather than optional enhancements. Without them, pilot activity risk replicating existing fragmentation in a digitised form.

Use Cases Grouped by Smart Data Clusters

The Coalition has identified a set of Smart Data Clusters which provide structured groupings of key property, transaction and participant data. Each cluster would link to a unique property identifier ensuring that all data consistently relates to the same property asset. Clusters could be designed to hold information for specific purposes, such as establishing property identity, confirming ownership, assessing material information or validating financial readiness. Taken together, these clusters form part of a Digital Property ID, bringing authoritative data components into a single, consistent representation of a property. This creates a reusable, trusted data layer that can be relied upon across the transaction and beyond.

Smart Data Clusters should be designed to work across organisations and systems, with embedded trust signals that clearly define the data, its source, who verified it, and when it was last updated. Consent would be permissioned by purpose, so that different sets of information can be shared separately depending on the stage of the transaction, whilst adhering to data minimisation principles. This ensures that only the necessary information is shared, while maintaining consumer control and privacy. This approach enables a more connected ecosystem. For example, core property details could be pre-populated across estate agent, lender and conveyancer systems using the same underlying data, reducing rekeying and inconsistency. Over time, it could also support a shared, real-time view of transaction progress, helping parties coordinate and reducing delays. The modular structure allows for underlying data to be grouped, selectively disclosed and reused in different combinations across stages, depending on the specific purpose for which the data is needed. This enables HDI, where data moves with the transaction across organisations rather than being recreated at each stage

The Coalition identified and grouped use cases into Smart Data Clusters and scored them. The highest scoring candidates include foundational interoperability (UPRN-anchored approaches), digital ownership identification and proof, and shared transaction progress visibility. These appear below with scoring (out of 10) and the expected value each use case is intended to deliver.

Property Identifiers and Unique Reference Numbers

Establishes the golden thread - a single, verified property identity everyone can use.

Use case	Description	Score	Expected value
Integrated Identity and Data Sources	Linking personal/company identity to property identity	7.14	Fewer duplicate checks; faster readiness
UPRN-Anchored Offers	Offers clearly linked to a specific verified property	7.57	Faster Decisions in Principle: fewer format requisitions
UPRN-Anchored Interoperability Fabric	Systems align on a shared property reference ID	7.71	Seamless linking/reuse

Persistent Property Identity (UPRN) Auto-population	Property details auto-populate using a unique property ID	7.71	Less re-keying; fewer mismatches; faster listing

Title and Ownership Services

Purpose: provides visibility and proof of title/ownership; supports faster title processes and earlier risk surfacing.

Use case	Description	Score	Expected value
Digital Property ID and Title Visibility APIs	Real-time digital access to property title information	6.86	Reduced rework; predictable completion
Digital Ownership Identification and Proof	Instant digital proof of ownership	8.00	Fewer fraudulent listings; quicker filtering
Smart Property Ownership Verification	Automated checks to confirm ownership status	7.43	Fewer requisitions; reduced fraud
Digital Ownership Data	Early sharing of tenure restrictions and covenants	7.29	Better filtering; fewer wasted viewings

Material Information and Risk

Purpose: delivers complete upfront property information to reduce renegotiations and unwanted surprises.

Use case	Description	Score	Expected value
API-Driven Data Collection for Listings	Listings take information directly from trusted, live data sources	6.43	Faster, accurate listings
Material Information Completeness Pre-Check	Early check to ensure required information is present	7.29	Quicker listing-to-offer; fewer renegotiations
Material Information Standard Model	One clear standard for what must be provided upfront	7.43	Quicker listing-to-offer; fewer renegotiations

Baseline Building Condition Data Pack	Early access to building condition data upfront	7.57	Better viewing; fewer renegotiations

Valuation and Mortgage Readiness

Purpose: proves finance credibility early and makes certain valuation and readiness components reusable.

Use case	Description	Score	Expected value
Source-of-Funds earlier via CRAs, Banks and/or HMRC	Upfront proof of funds from the buyer	8.43	Reduced delays; better fraud detection

Legal and Compliance

Purpose: codifies policies and reduces rework in compliance and completion.

Use case	Description	Score	Expected value
Mandated Sharing of Conveyancing Updates and Searches	Automatic, real-time sharing of legal updates and searches	7.57	Fewer duplicates; faster exchange

Fraud Risk and Intelligence

Purpose: shares consented fraud/risk signals to detect issues earlier.

Use case	Description	Score	Expected value
Permissions Mechanism (consent, security, and audit framework)	Common permissioning and audit pattern to enable safe sharing	7.57	Trusted sharing; consumer control

Chain Progress and Telemetry

Purpose: improves visibility of dependencies, blockers and progress across parties.

Use case	Description	Score	Expected value
Progress Dashboard for All Parties	Clear visibility for buyers, sellers and professionals on transaction progress	7.43	Shorter time to exchange

Consumer Wallet and Records

Purpose: enables post-completion to reuse and consumer-held records across the property lifecycle.

The Coalition surfaced additional use cases in this area (without associated scores). These include:

- Post-completion data wallet (consumer)
- Digital equipment passport and compliance
- Lifecycle affordability and planning support

These use cases are important for long-term lifecycle value but require further refinement on scope, reliance, and how they interact with the formal trust framework. Smart Data clusters could help move the industry from fragmented documents to structured, reusable data. The Coalition's approach establishes a foundational data layer for faster transactions, reduced duplication, stronger fraud resilience, and a more reliable home buying system.

Specific Datasets Mapped to Use Cases

The Coalition's data mapping started to identify the types of datasets required by each use cases, The full mapping covers 77 datasets across 15 use cases and 7 Smart Data Clusters.[18]

The following illustrates the types of datasets mapped to each cluster and will be further defined in the next phase of work as use cases are developed by coalition members.

Property Identifiers and Unique Reference Numbers

(4 use cases, 18 datasets mapped)

Types of identified datasets include: UPRN, title number/UPRN, offer data, Ordnance Survey baseline data.

Title and Ownership Services

(4 use cases, 16 datasets mapped)

Types of identified datasets could include: HM Land Registry title information, HM Land Registry register, registration status data, tenure data. OC1 and OC2 documents, title validation data, consumer data/ID, Digital ID/QES data, certainty of title data, conveyancer-verified data, remaining lease term, service charge data.

Material Information and Risk

(4 use cases, 22 datasets mapped)

Types of identified datasets could include: material information bundles, API-driven data collection, building condition survey data, surveys, captured/stored property information, EPC register, local council planning information, utilities information, comparables data, land charges data, surveyor data (property attributes), LiDAR, satellite imagery, controlled services registration certificates.

Valuation and Mortgage Readiness

(1 use case, 6 datasets mapped)

Types of identified datasets could include: source of funds via Open Banking data, credit bureau data, banking confirmation data, HMRC data, source of funds/source of wealth documentation, AML data.

Legal and Compliance

(1 use case, 5 datasets mapped)

Types of datasets could include: conveyancing update data, local authority search data (LLC1/CON29).

Fraud Risk and Intelligence

(1 use case, 5 datasets mapped)

Types of identified datasets could include: digital signatures, compliance/regulatory data, KYC/AML data, fraud pattern analytics.

Chain Progress and Telemetry

(1 use case, 5 datasets mapped)

Types of identified datasets could include: key milestones, conveyancing update, offer data, chain representation metadata, actions required, bottleneck analytics.

Front-runner Pilot Set

The Coalition's prioritisation framework operates across three levels. Smart Data Clusters provide the overarching structure, organising related data attributes by function (e.g., Title and Ownership).

Within these, specific use cases define practical applications of data reuse that can be prioritised and tested (e.g., UPRN-based interoperability, digital ownership verification). Each use case is underpinned by defined datasets-the individual data elements required to enable it (e.g., UPRN, HMLR title data, EPC data).

The 77 datasets mapped in this chapter provide the underlying detail; the use cases enable scoring and prioritisation; and the Smart Data Clusters connect these elements into a coherent structure.

Coalition work indicates that the most effective way to progress Open Property is to advance a small number of high-impact, feasible pilots that demonstrate reuse of trusted information across parties and reduce friction at key hand-offs. The Coalition's prioritisation work surfaced a set of high-scoring candidates that can act as early anchors:

- **UPRN-anchored interoperability** (enabling consistent property identity and linking across participants)
- **Digital ownership identification and proof** (enabling earlier verification and fraud resilience)
- **Shared transaction progress visibility** (for example a progress dashboard for all parties)

These candidates are foundational because they support multiple downstream use cases and provide a practical basis for testing data reuse, trust signals, consent models, and measurable benefits.

Relationship to Digital Property Pack / Sale Ready Pack concept

Initial Coalition discussions highlighted a Digital Property Pack / Sale Ready Pack approach as a pragmatic route to improving upfront information quality and reducing late-stage surprises. The key benefits of such an approach including:

- upfront property information and material information completeness
- clearer trust signals and provenance
- a structured mechanism for reuse across participants

However, the Coalition's work also suggests that the pack should be seen as a wrapper for reusable Smart Data Clusters and trust signals, rather than a standalone artefact that creates duplication.

Ecosystem Mapping: Data Exchanges and Value Flows

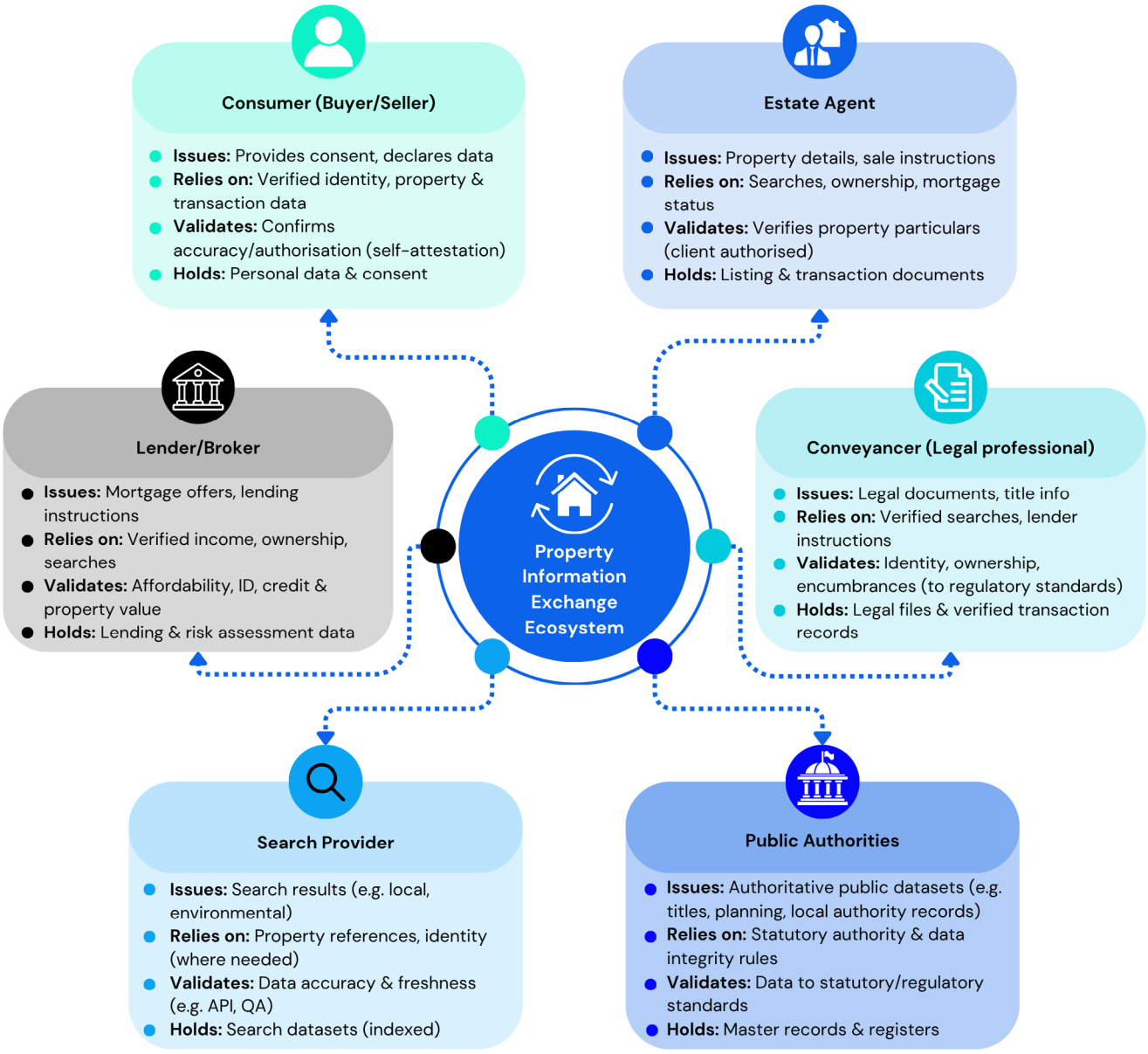
This Chapter sets out the framework for ecosystem mapping. The purpose of this initial mapping is to define the reusable exchanges, participant roles and trust signals and to support conformance and assurance by making visible which participants are expected to meet which requirements. A more granular mapping, including specific participants, data flows, and trust signals per exchange should accompany any future pilots.

Exchange types mapped to Smart Data Clusters

The Coalition's use cases imply a small number of recurring exchange types that form the backbone of ecosystem mapping. These align directly to the Smart Data Clusters set out in Chapter 5.

Exchange type	Corresponding Smart Data Cluster	Primary value drivers
Property identity and linking	Property Identifiers and Unique Reference Numbers	Interoperability, reduced re-keying, reduced duplication
Ownership and tenure visibility	Title and Ownership Services	Earlier issue surfacing, fraud resilience, reduced wasted effort
Upfront property information and risk	Material Information and Risk	Fewer late surprises, improved certainty, reduced fall-through
Mortgage readiness and valuation inputs	Valuation and Mortgage Readiness	Faster decision components, reduced rework
Transaction progress visibility	Chain Progress and Telemetry	Less chasing, fewer missed actions, improved predictability
Permissioning and secure reuse	Fraud Risk and Intelligence	Safe authorised sharing, traceability and audit
Post-completion and lifecycle reuse	Consumer Wallet and Records	Reuse for remortgage, maintenance, insurance, resale

Participant roles and responsibilities per exchange



Coalition work indicates that the lack of role clarity is a root cause of duplication and re-verification. For each exchange type, the ecosystem map should explicitly identify participant roles, specifying who can issue, validate and rely on specific information[7]:

- **Data holder:** who holds or manages the information for reuse (and in what form)
- **Verifier:** who validates it (and to what standard)
- **Relying party:** who can rely on it (and under what conditions)
- **Issuer:** who creates or asserts the information (and under what authority)

A single organisation may hold more than one role across different exchanges (e.g., acting as issuer in one context and relying party in another).

This should be expressed by stakeholder type (e.g., consumer, estate agent, conveyancer, lender/broker, search provider, and public data custodian), with the option to refine to named organisations where appropriate and approved.

Trust signals, lifecycle trust events, and freshness rules

To enable reuse, each exchange must carry the trust signals required for another party to rely on it safely. The ecosystem map should specify, for each exchange:

- **Provenance metadata:** what the data is, who provided it, when it was created, what it applies to
- **Validation status:** whether and how it was verified, by whom, and at what time
- **Lifecycle trust events:** issued, verified, updated, expired, revoked (as applicable)
- **Freshness and validity windows:** how long it can be relied on for specific purposes, and when re-verification is required
- **Change notification expectation:** which attributes require near real-time notification versus periodic refresh versus on next use

Consent, delegation, and auditability across exchanges

Because exchanges often span multiple parties and stages, the ecosystem map must define how permissioning works across the Open Property value chain without creating consent fatigue or repeated re-authorisation.

For each exchange, the ecosystem map should capture:

- the permissioning basis (consumer consent, contractual permission, statutory basis where applicable)
- how consent is captured and logged
- how delegation of consent works where appropriate (for example enabling agents or conveyancers to share relevant information with prospective buyers)
- how revocation and time-bounded access is implemented
- what audit trail is required to support accountability and dispute handling
- conformance and assurance requirements (what "good" looks like, how it is evidenced, and how reliance decisions are supported)

Digital identity should be treated as an enabling capability where relevant, supporting reusable identity credentials and digitally signed assertions, without implying a specific wallet product or scheme.

Value flows and metrics

The ecosystem map should not only show data movement but also identify where value is created and how it will be measured in Phase 2.

For each exchange, the map should capture:

- **Value driver:** time saved, rework avoided, improved certainty, reduced exceptions, reduced fraud risk
- **Beneficiaries:** which actor groups benefit and how
- **Measurable metrics:** reduced touchpoints, fewer duplicate requests, reduced time-to-milestone, reduced exception rates, increased reuse rate of verified information

This enables pilots to link data reuse directly to outcome measures and supports evidence-based decisions on scaling and any consideration of mandate backstops where required.

The Coalition also recognises that effective reuse at scale is likely to require clarity on sector oversight and enforceability, particularly in a market where regulatory responsibilities are currently fragmented across multiple bodies. These design elements form the basis of the implementation roadmap set out in Chapter 8.

These findings outline an integrated delivery proposition that is feasible and consequential. What remains is to specify the foundational components, namely the trust framework, standards alignment, consent architecture, and measurement approach. Without these, even well-designed pilots will risk falling back into bilateral workarounds. Those key enablers are the core focus of Chapter 7.

Chapter 7

Key Enablers

Our previous chapter has systematically established what is worth building. This chapter continues to set out what must be in place for it to properly function. The first section reviews the enabling components already present in the market and explains why they have not yet cohered into a working scheme. The second defines foundational outputs required before pilot delivery can begin.

Where We Are Now

The Coalition was already aware that the market is not starting from zero. Many important enabling components already exist, including widely used identifiers, established transaction roles, a growing set of data standards artefacts and mature verification services. The challenge is that these components are not yet coordinated into a coherent scheme model that supports safe, trusted reuse across the end-to-end journey. The key enablers identified by the Coalition are set out in this chapter, with the reasons why these have not solved the problem to date set out in Chapter 5.

Open Property therefore needs to coordinate what already exists into a coherent delivery model, rather than creating another competing set of artefacts.

What Must be in Place to Make Open Property Work

Open Property delivery depends on a small number of foundational enablers. These are interdependent: if they are not aligned, participants default back to duplication, manual checking and bilateral workarounds. Sequencing must therefore prioritise actions that unlock trusted reuse through multi-party pilots, supported by clear measurement, and then expand coverage over time.

Core outputs required

To enable trusted reuse at scale, a consistent set of core outputs must be defined and agreed:

- **Minimum Smart Data Clusters and datasets:** a defined set of structured data attributes required for priority use cases, including clarity on which information must be structured versus document-based, and how it can be reused across stages and participants
- **A formal trust framework and lifecycle trust events:** a clear definition of trust roles (as set out in Annex), reliance conditions and lifecycle trust events (e.g., issued, verified, updated, expired, and revoked), supported by explicit expectations for provenance and auditability
- **A consent and permissioning model:** a consistent approach to permissioning that enables secure sharing and reuse without creating consent fatigue, including time-bound access, revocation, delegation and full auditability of data access and use

- **Standards inputs and conformance expectations:** a defined approach to interoperability, including candidate standards, schema inputs and clear conformance expectations that specify what "good" looks like, how compliance is assessed, and how versioning and change are managed over time
- **A measurement and reporting framework:** a consistent set of metrics and reporting mechanisms to evidence adoption, performance and outcomes, supporting iterative improvement and scaling decisions

In short, these identified enablers are interdependent. In their absence, pilots will continue reproduce today's fragmentation in digitised form. However, once they are in place, sequencing becomes a workable exercise instead of a recurring negotiation. The next chapter translates these foundations into a promising delivery roadmap organised across industry, standards, and policy tracks.

Chapter 8

Implementation Roadmap and Delivery

Open Property's value depends as much on disciplined sequencing as on its component parts. This chapter sets out the delivery model. It covers how home buying use cases should be strategically phased, the important considerations that govern implementation, the distribution of responsibilities across Government, industry, and the cross-scheme coordination function, and finally, the indicative milestones against which Phase 2 progress can be tangibly measured.

Use Case Phasing

Coalition inputs suggest a phased approach that starts with a feasible set of pilots and expands by reusing the same foundations (identifier approach, standards alignment, trust markers, permissioning patterns). Phase 2 will focus on industry-led pilots and prototypes designed to test operational feasibility, adoption and measurable benefit, with timing and scope confirmed through Coalition and stakeholder alignment.

The Coalition has identified top candidate use cases that can act as early delivery anchors. These include foundational interoperability (UPRN-anchored approaches), digital ownership identification and proof, and shared transaction progress visibility (for example a progress dashboard). Final selection and sequencing will be confirmed during Phase 2, but should prioritise combinations that share common enablers and can be delivered coherently as a practical pilot set.

Delivery should be organised around Smart Data Clusters: reusable sets of attributes that clarify what information is needed, how it should be structured, how it is refreshed, and what trust signals must travel with it, without prescribing a specific technical architecture.

Near term (Phase 1 mobilisation and pilots)

- Confirm the Phase 2 pilot set by selecting a small number of top candidates use cases (based on prioritisation scores and delivery dependencies), and define what "good" looks like for adoption
- Define the minimum viable Smart Data Clusters required for the pilot set, including which attributes are essential, which can be referenced, and what must be structured versus document-based
- Define a minimum viable formal trust framework for pilots: role definitions (as set out in Annex), trust events, and baseline provenance and auditability expectations
- Define the consent and permissioning model required for reuse, including delegated consent patterns where appropriate
- Confirm how digital identity will be used as an enabling capability within pilots, ensuring it is framed as decision support and enabling infrastructure
- Run pilots and prototypes to test operational feasibility, reuse and measurable benefits, with baseline measurement established at pilot design stage

Medium term (evidence-led expansion)

- Expand into adjacent use cases that share the same enablers, reusing the same Smart Data Clusters and trust markers rather than creating new bespoke integrations
- Increase reuse across more parties and stages, including deeper integration into operational workflows where evidence shows material reduction in duplication and delay
- Deepen standardisation coverage where evidence shows it reduces friction, while maintaining equal access
- Formalise governance, conformance and sustainability approaches based on pilot evidence, including whether and where mandate backstops are required to prevent fragmentation

Longer term (scaled adoption and lifecycle)

- Scale across the end-to-end journey and increase market coverage, with consistent interoperability and trust signals across participants
- Extend beyond England and Wales where appropriate, maintaining future compatibility
- Extend from transaction-focused capability into lifecycle reuse, enabling trusted data to support remortgage, maintenance, insurance, and resale

Key Considerations

There was consensus amongst Coalition Partners that a home buying Smart Data Scheme should be aligned to cross-scheme governance expectations, so that trust, assurance and interoperability work consistently across sectors over time. This enables verified information to be relied upon across participants, reducing re-checking as the default behaviour and supporting coordinated, end-to-end delivery through practical HDI.

As such the Coalition agreed a set of core implementation assumptions, that home buying Smarter Data Scheme should:

- Build on existing standards, infrastructure and market capabilities rather than duplicating them
- A common baseline with sector extensions, allowing property-specific needs while maintaining cross-scheme consistency
- Voluntary-first, evidence-led implementation, with the question of regulatory mandate to be informed by Phase 2 evidence
- Cross-scheme coherence to support future cross-sector journeys
- People-centred outcomes, improving speed, certainty, trust and cost efficiency for consumers and market participants
- Open participation through clear conformance expectations, enabling multiple providers to compete on equal terms

Foundational Enablers

Open Property roles and responsibilities will be distributed across multiple organisations.

Within this ecosystem, responsibilities are distributed across three levels:

1. **Sector implementation and scheme delivery.** Property sector participants (including Estate Agents, Surveyors, Conveyancers, etc), develops data standards and integrates systems. This includes piloting solutions, operational integration and participation in conformance and assurance processes that enable trusted reuse of information.

2. **Cross-scheme coordination and shared standards** A central coordination function (likely to be defined within DBT's Smart Data Guidebook) provides shared guidance, common frameworks and alignment across Smart Data scheme areas. There may be a requirement at this level to mandate industry standards to drive adoption. This ensures consistency in standards, trust and assurance mechanisms, and interoperability as cross-sector use cases emerge.

3. **Policy oversight and enforceability.** Government and regulators provide oversight, ensuring that consumer protection, market integrity and interoperability are maintained.

A key design principle is to enable interoperable Open Property ecosystems which fuel competition and drives innovation to the benefit of end consumers.

Market Roles and Responsibilities

Open Property cannot be delivered by one organisation alone. It requires shared leadership, clear allocation of responsibilities and a coordinated approach from Phase 2 pilots into scaled adoption. Roles must be explicit so that participants can rely on data exchanges with confidence, and so that standards alignment does not fragment into multiple incompatible approaches.

Industry-led

Industry participants are best placed to prove what works operationally and to embed change into day-to-day delivery. Responsibilities include:

- **Pilot delivery and operational learning:** participate in, implement and iterate pilots (including UPRN-enabled interoperability, digital ownership proof, shared progress visibility and source of funds approach where appropriate), and share outcomes to enable evidence-led scaling
- **Integration and change management:** implement interoperability and reuse within existing systems and processes, and make the operational shifts required to stop defaulting to re-checking and duplicated evidence requests
- **Service and experience design:** ensure consumer and professional experiences are coherent, with clear expectations, transparent progress and decision support that improves confidence without displacing professional judgement
- **Contribution to reusable schemas and practices:** provide domain expertise to shape minimum viable Smart Data Clusters, attribute definitions and what "good" looks like for reusability

Cross-market coordinated responsibilities

Certain capabilities only work if adopted consistently across the ecosystem. Cross-market coordination should focus on:

- **Smart Data Clusters to schemas/interfaces:** coordinate the translation of clusters into practical pilot schemas/interfaces and interoperability patterns, without mandating a specific technical architecture
- **Standards alignment and conformance:** align on candidate standards inputs and minimum conformance expectations for pilots, maintaining equal access and avoiding endorsement of any single private organisation or standard, while being explicit about interoperability requirements
- **A single formal trust framework:** should be established and operated, defining roles[19], trust events, reliance conditions and audit expectations. This must include clear conformance and assurance ownership. An accountable scheme-level function is required to operate conformance and assurance consistently, enabling reliance at scale without reverting to bilateral checks
- **Shared measurement and learning:** agree common metric definitions, baseline approaches, reporting cadence and the mechanism for using evidence to refine pilots and inform scale decisions

Government-enabled responsibilities

Government and public bodies have a critical enabling role, particularly where public data is required and where coordination is needed to prevent fragmentation.

- **Public data supply and accessibility:** address bottlenecks in public data availability, freshness and format that constrain reuse (with public data custodians such as HM Land Registry and local authorities as key examples)
- **Cross-department coordination:** ensure policy, regulatory, and operational alignment supports upfront information, consistent trust signals and safe authorised sharing
- **Convening and signalling:** reduce fragmentation by setting clear direction of travel and supporting evidence-led mobilisation of pilots and adoption

Smart Data cross-scheme coordination

Coalition inputs align with the need for cross-scheme coordination to maintain interoperability and consistency across Smart Data scheme areas. This coordination function would provide shared guidelines and common services (for example around assurance patterns and authentication approaches), ensuring that property does not evolve in isolation and that cross-sector use cases can be supported over time, facilitating full HDI.

Accountability and delivery coordination

Clear accountability is required to move from roadmap to delivery. While Open Property operates through a federated model, specific functions must have defined ownership to ensure progress is coordinated and measurable. This requires:

- **Named or proposed leads for pilot delivery,** responsible for coordinating implementation across participating organisations

- **Clear ownership of cross-market functions,** including standards alignment, trust framework development and conformance processes
- **Defined coordination mechanisms,** ensuring that dependencies across workstreams are managed and that decisions are made in a timely manner
- **Agreed reporting structures,** enabling progress, risks and outcomes to be tracked transparently across participants

Sequencing and Timeline

Prioritisation principles

Delivery is prioritised based on three core criteria:

- **Dependency criticality:** what must be in place for trusted data reuse to occur across participants
- **Ability to evidence value quickly:** what can be tested through pilots to demonstrate measurable impact
- **Reliance on cross-government or policy alignment:** what requires coordination beyond industry to scale safely and consistently

Tiered delivery model

Delivery should be structured across three tiers, reflecting both dependency logic and increasing levels of coordination required for scale.

Tier 1: Immediate enablers (0-6 months)

Objective: enable trusted reuse in pilots. These are the minimum conditions required to initiate Phase 2 delivery and test reuse in practice.

- Confirm the Phase 2 pilot set, sequencing logic and success measures
- Define minimum viable Smart Data Clusters and associated datasets for priority use cases
- Establish a minimum viable trust framework (roles, reliance conditions and lifecycle trust events)
- Define consent and permission patterns, including delegation and auditability
- Confirm a practical identifier approach (including alignment on UPRN usage and matching methods)
- Initiate cross-government engagement on standards and governance alignment

These enablers should be defined at a minimum viable level, sufficient to support pilots, rather than fully standardised from the outset.

Tier 2: Pilot delivery and convergence (6-18 months)

Objective: demonstrate value and refine the model through evidence.

- Implement pilot schemas/interfaces and integration patterns

- Run pilots across participating organisations, with baseline and outcome measurement
- Test reuse of verified information across participants and stages
- Establish early conformance approaches to define what "good" looks like in practice
- Use regulatory sandbox environments where appropriate to resolve cross-sector issues
- Progress convergence of standards inputs and interoperability patterns based on pilot evidence

Tier 3: Scaling, governance and formalisation (18-36+ months)

Objective: enable consistent, scalable adoption across the market.

- Formalise governance, assurance and sustainability models based on pilot evidence
- Establish a consistent conformance and assurance regime to support reliance at scale
- Consolidate standards and interoperability approaches to reduce fragmentation
- Embed cross-scheme coordination to ensure alignment with other Smart Data initiatives
- Define and implement mandate backstop mechanisms where voluntary adoption is insufficient

Parallel delivery tracks

Delivery will proceed through three interdependent but distinct tracks, operating at different speeds:

1. Industry delivery track (fast-moving)

- Pilot design, implementation and integration
- Operational change and adoption
- Measurement of outcomes and reuse behaviour

2. Standards and ecosystem alignment track (medium pace)

- Definition and refinement of Smart Data Clusters and schemas
- Interoperability patterns and conformance expectations
- Convergence of standards inputs across the ecosystem

3. Policy and governance track (iterative and longer-term)

- Development of formal trust frameworks and reliance models
- Cross-government alignment on governance and scheme design
- Policy coordination and mandate considerations

These tracks are interdependent but operate at different speeds. Pilot evidence from the industry delivery track should inform standards development and policy decisions over time, reducing the risk of premature standardisation or misaligned regulation.

Dependency sequencing

Certain capabilities must be in place before others can deliver value. In particular:

- Trusted reuse requires a minimum viable trust framework and clearly defined data structures
- Interoperability depends on a consistent identifier approach and alignment on core attributes
- Scaling requires conformance, assurance and governance mechanisms that enable participants to rely on shared data without re-checking

Sequencing should therefore prioritise establishing these foundations early, while allowing other components to evolve iteratively through pilot evidence.

Indicative timeline

0-6 months (Phase 2 mobilisation and early pilots)

- Pilot set confirmed and mobilisation underway
- Minimum viable data, trust and consent frameworks defined
- Initial pilots launched with baseline measurement
- Early engagement on standards and governance alignment initiated

6-18 months (evidence and convergence)

- Pilots operating and iterating based on evidence
- Measurable improvements demonstrated (e.g., reduced rework, improved timelines)
- Early conformance approaches established
- Standards inputs and interoperability patterns begin to converge
- Regulatory sandbox outputs inform policy and governance development

18-36+ months (scaling and formalisation)

- Expanded participant coverage and increased reuse across the ecosystem
- Governance, assurance and sustainability models formalised
- Standards consolidation and cross-scheme alignment embedded
- Evidence-led decisions on mandate backstops and adoption acceleration

Relationship to pilot set sequencing

The Coalition's high-scoring candidate use cases provide a practical anchor set for Phase 2 pilots. These should be sequenced based on dependency logic:

- **Property identity and interoperability (e.g., UPRN-aligned approaches)** provide a foundation for linking data across participants

- **Ownership identification and proof** builds on identity and trust framework foundations
- **Transaction progress visibility** can be delivered in parallel once common identifiers and minimum trust signals are established
- **Financial readiness components (e.g., source of funds)** can be layered on once consent and permission patterns are proven

This sequencing reflects dependency relationships rather than strict linear delivery, allowing pilots to progress in parallel where appropriate while maintaining coherence and reusability.

Milestones

This roadmap assumes Phase 2 mobilisation begins immediately following Phase 1 and proceeds through a short set of timeboxed milestones. Milestones below reference the confirmed Phase 2 pilot set defined in Chapter 5, and include the cross-government alignment, trust framework and conformance steps required to maintain interoperability with other Smart Data scheme areas.

Tier 1 - Immediate enablers (0-6 months)

Milestone	Track	Outcomes
Pilot set mobilisation	Industry	Pilot participants confirmed and mobilisation underway
Minimum viable data defined	Standards	Core Smart Data Clusters agreed for pilot use cases
Minimum viable trust framework	Policy + Standards	Initial roles, trust events and reliance conditions defined
Sandbox initiated	Policy	Cross-regulator engagement established

Tier 2 – Pilot delivery and convergence (6–18 months)

Milestone	Track	Outcomes
Pilots live and iterating	Industry	Measurable reuse and outcome data captured
Early conformance approach	Standards	Initial "what good looks like" defined and tested
Standards convergence begins	Standards	Alignment emerging across key schemas
Policy learning loop	Policy	Sandbox outputs informing policy thinking

Tier 3 – Scaling and formalisation (18–36+ months)

Milestone	Track	Outcomes
Governance model defined	Policy	Agreed operating model and oversight structure
Conformance and assurance scaled	Policy + Standards	Participants able to rely on shared trust signals
Adoption expansion	Industry	Increased coverage and reuse across ecosystem
Mandate decision point	Policy	Evidence-based decision on intervention

Chapter 9

What Success Looks Like

A delivery plan is only as credible as its measurement architecture. This chapter defines success in operational terms. It sets out the outcomes the Open Property scheme should deliver, the metrics that will evidence progress in socio-economic impact, and the immediate next steps required to mobilise Phase 2 against a clear baseline.

Measurable Outcomes

This chapter defines the outcomes Open Property aims to deliver, the metrics that will evidence progress, the enablers and barriers that shape the delivery landscape, and why the current moment represents a practical opportunity to act. The economic case and scale of current inefficiencies are set out in Chapter 3.

Metrics

Open Property success should be assessed not only through operational improvements, but also through measurable economic impact, including contribution to productivity, reduced transaction friction and realised value from trusted data reuse.

Baseline measurement will be established as part of Phase 2 pilot design, not as a prerequisite for agreeing the metric framework. Early pilots will provide directional evidence before national-level impacts can be claimed.

A practical set of success metrics includes:

Efficiency

- Reduced end-to-end timeline
- Reduced time lost to rework and duplication
- Reduced touchpoints and manual interventions per transaction

Certainty

- Reduced fall-through
- Earlier issue identification and resolution
- Improved predictability of completion

Trust and Compliance

- Increased provenance coverage for key data elements
- Reduced exception rates caused by inconsistent information

- Improved auditability of checks and decisions

Adoption and Ecosystem Health

- Number of participants integrated
- Coverage of transactions using agreed standards
- Reuse rate of verified information across parties

Fraud and Market Harm

- Reduced known fraud vectors linked to manipulated or inconsistent evidence
- Improved detection rates where applicable

Immediate Next Steps

The immediate priority is to mobilise Phase 2 delivery. The following actions establish the foundations for pilot delivery and coordinated implementation:

- Confirm the Phase 2 pilot set and sequencing, including the selection of high-impact use cases and definition of "meaningful participation" across stakeholder types
- Establish delivery leadership and coordination structures, including proposed leads for pilot delivery, cross-market functions (e.g., standards, trust framework, conformance) and reporting arrangements
- Define minimum viable Smart Data Clusters and datasets for the pilot set, including structured data requirements, reuse expectations, and validity rules
- Agree the minimum viable trust framework and consent model, including roles, trust events, reliance conditions and permission patterns
- Align with cross-government Smart Data direction of travel, including standards governance, assurance expectations and compatibility with the Smart Data Guidebook
- Mobilise pilot delivery, including onboarding participants, establishing baseline metrics and initiating implementation and testing
- Establish measurement and reporting mechanisms across pilots

Together, these steps create the conditions to test, refine, and scale Open Property through evidence-led delivery.

Clear outcomes and measurable metrics provide the evidence base for scaling decisions. With the success framework set, the roadmap turns to its concluding recommendations. The final chapter sets out ten specific recommendations developed with key stakeholders across product, infrastructure, and governance that the Coalition urges Government and industry to take forward.

Chapter 10

Recommendations

This chapter sets out a prioritised set of recommendations developed with Coalition stakeholders, grounded in the analysis, use cases and delivery model set out in this roadmap. They are designed to enable coordinated, evidence-led implementation across Government, industry and regulators.

Interoperability across Smart Data schemes is treated as a cross-cutting principle throughout rather than as a standalone recommendation. Each recommendation should be implemented with a view to maintaining alignment with other Smart Data scheme areas and supporting cross-sector interoperability as consumer and business journeys increasingly span multiple domains.

Product and Driving Adoption

Recommendation 1. Adopt an evidence-led pilot approach to prove Smart Data in property

Outcome: Demonstrate measurable value and feasibility of trusted data reuse in real-world settings.

What needs to happen:

- Deliver a Phase 2 pilot set focused on high-impact use cases (e.g., property identity, ownership verification, progress visibility)
- Define baseline metrics and measure improvements (time to milestones, rework, fall-through rates, reuse of verified data)
- Use pilot evidence to inform scaling, governance and policy decisions

Why this matters: Without real-world testing, Smart Data will remain conceptual. Evidence-led pilots are essential to validate assumptions, build market confidence and demonstrate tangible benefits for consumers and industry.

Proposed lead actors: Industry participants (delivery), CFIT (coordination), DBT (input to ensure pilot outputs can inform cross-scheme policy development)

Evidence in roadmap: Chapters 3, 5, 6

Recommendation 2. Establish a cross-sector multi-regulator sandbox to enable safe, scalable innovation

Outcome: Enable controlled testing of cross-sector data sharing and regulatory coordination.

What needs to happen:

- Build on the FCA's existing Digital Sandbox, which has already engaged CLC, OPDA and HM Land Registry, to extend coordination across regulators relevant to property transactions
- Establish cross-regulator coordination involving, FCA, ICO and the Digital Regulation Cooperation Forum (DRCF) in consultation with DBT and other Government departments relevant to the Smart Data agenda.
- Test use cases involving data sharing, consent, liability and interoperability across regulated boundaries
- Use findings to inform regulatory alignment and future implementation models

Why this matters: Property transactions span multiple regulatory domains. The regulatory and policy barriers identified in Chapter 5 highlight the need for coordinated resolution of cross-sector regulatory questions before scaling, balancing innovation with consumer protection.

Proposed lead actors: DBT (Smart Data programme), FCA, ICO, DRCF members

Evidence in roadmap: Chapters 4, 5

Recommendation 3. Develop a shared property identity and transaction visibility capability

Outcome: Improve coordination and transparency across the transaction journey.

What needs to happen:

- Define and implement shared milestone definitions across key participants
- Enable permissioned sharing of transaction progress data
- Support development of tools (e.g., dashboards) that provide visibility to consumers and professionals
- Ensure that any Digital Property ID or data service providers deliver clear, demonstrable value beyond aggregation of public datasets (e.g., through insight generation, risk modelling, workflow optimisation or decision support)

Why this matters: Limited visibility across the transaction is a key driver of delay and inefficiency. Shared visibility improves coordination, reduces duplication and supports earlier issue resolution.

Proposed lead actors: Industry participants (estate agents, conveyancers, lenders), PropTech providers

Evidence in roadmap: Chapters 3, 5

Recommendation 4. Embed consumer trust, understanding and control into Smart Data implementation

Outcome: Enable informed participation, sustained trust and adoption by consumers, underpinned by strong consumer engagement and research.

What needs to happen:

- User testing and consumer research should be embedded into all pilot and product deployments to ensure trust, clarity, and effective adoption, particularly where user understanding may be nuanced.
- Provide clear, simple explanations of how Smart Data works and how consumer data is used
- Enable transparent consent, visibility and control mechanisms
- Ensure consistent communication across participants and channels

Why this matters: Smart Data depends on informed consent and sustained consumer trust. Without clear understanding and confidence, adoption will be limited and system-wide benefits will not be realised.

Proposed lead actors: Industry, Government, scheme-level coordination function

Evidence in roadmap: Chapters 3, 5, 6

Foundational Data and Interoperability Enablers

Recommendation 5. Establish a consistent property identification and referencing approach

Outcome: Enable consistent identification and linking of property data across systems.

What needs to happen:

- Align existing identifiers (e.g., UPRN, title number) through a consistent referencing and mapping approach, rather than creating a single unified identifier
- Define and agree a shared conceptual model of "property" that can link address-based, land-based and ownership-based datasets

- Define how identifiers are governed, maintained and updated (including property changes such as subdivision)
- Enable use of identifiers across participants to support interoperability

Why this matters: Fragmentation in how property is identified reflects differences in underlying concepts (address, land, ownership). A shared conceptual model and referencing approach is required before deeper interoperability can be achieved.

Proposed lead actors: HM Land Registry, Ordnance Survey, GeoPlace, DBT

Evidence in roadmap: Chapters 5, 6

Recommendation 6. Enable upfront, standardised digital property information

Outcome: Reduce late-stage surprises and improve transaction certainty.

What needs to happen:

- Define minimum upfront information requirements and standard formats
- Enable digital property logbooks and reusable data structures
- Improve availability and standardisation of search and survey data

Why this matters: Information is often fragmented and becomes available too late in the process. Earlier, standardised information improved certainty, reduces fall-through risk and enables more efficient transactions.

Proposed lead actors: Industry bodies (e.g., RICS), local authorities, conveyancers, data providers

Assumed posture: Voluntary, with MHCLG reform programme alignment

Note: *This recommendation overlaps with MHCLG's home buying and selling reform programme and is subject to MHCLG review.*

Evidence in roadmap: Chapters 3, 5

Recommendation 7. Establish technical standards alignment for trusted data reuse

Outcome: Enable consistent, interoperable data exchange across participants.

What needs to happen:

- Align on candidate technical standards and schema inputs for pilot delivery
- Define minimum conformance expectations for interoperability

- Maintain equal access and avoid endorsement of any single private standard, while being explicit about what "good" looks like
- Ensure compatibility with cross-scheme Smart Data patterns

Why this matters: Without technical standards alignment, participants cannot interoperate and reuse breaks down into bespoke point-to-point integrations.

Proposed lead actors: Industry groups, such as OPDA, to be confirmed in Phase 2

Assumed posture: Voluntary initially, informed by Phase 2 evidence

Evidence in roadmap: Chapters 5, 6

Governance, Trust and Operating Model

Recommendation 8. Establish a shared trust framework and conformance approach

Outcome: Enable participants to rely on shared data with confidence.

What needs to happen:

- Define roles and responsibilities as part of a formal trust framework
- Establish conformance and assurance processes
- Define reliance conditions and audit expectations

Why this matters: Without a shared trust and assurance framework, participants default to re-checking and bilateral workarounds, preventing reuse at scale.

Proposed lead actors: Industry groups, such as OPDA, to be confirmed in Phase 2

Assumed posture: Voluntary initially, with mandate backstop if evidence shows voluntary adoption is insufficient

Evidence in roadmap: Chapters 4, 5, 6

Recommendation 9. Standards alignment

Outcome: Provide clarity, confidence and protection for market participants and consumers.

What needs to happen:

- Develop coordinated standards for data governance, security and quality assurance
- Align with DBT's Smart Data Guidebook and cross-sector standards

- Establish joint working across MHCLG, DSIT, HM Land Registry, DBT, and the industry stakeholders, building on the work of existing forums such as OPDA and DPMSG

Why this matters: Clear and consistent regulatory and standards alignment is required to enable investment, reduce uncertainty, and support safe data sharing.

Proposed lead actors: MHCLG, DSIT, HM Land Registry, DBT, industry stakeholders

Assumed posture: Government-led coordination with industry input

Note: *HM Land Registry's role is as a data custodian and contributor, rather than a regulator, and responsibilities should be aligned accordingly.*

Evidence in roadmap: Chapters 4, 5, 6

Recommendation 10. Establish a coordinated Smart Data governance and delivery function

Outcome: Ensure consistency, interoperability and trust across Smart Data schemes.

What needs to happen:

- Define and coordinate governance across industry and government, building on or aligning with existing forums (e.g., OPDA, DPMSG, cross-government working groups)
- Provide shared guidance on APIs, consent, data quality and governance
- Coordinate delivery across pilots, standards and trust frameworks
- Ensure alignment across sectors and schemes

Why this matters: Without coordinated governance, implementation risks fragmentation, inconsistent adoption and reduced trust across the ecosystem.

Proposed lead actors: DBT, cross-government partners

Assumed posture: Voluntary-first, with the question of whether regulatory backing is required to be informed by Phase 2 evidence

Evidence in roadmap: Chapters 5, 6

To sum up, these ten policy recommendations form a coherent programme across Government, regulator, and industry partners. Each depends on the others, and partial adoption will reproduce the fragmentation Open Property is intended to resolve.

Annex

This annex consolidates the supporting material referenced throughout the Open Property roadmap. It draws together international comparables, the value proposition disaggregated by stakeholder group, the rationale for selecting home buying as the flagship use case, and finally, a glossary of terms that recur in the analysis that carry specific meaning throughout.

International Comparables

The challenges experienced by the market are not unique to the UK, and there are examples from international markets that have been considered and discussed by the Coalition:

- **Australia (digital settlement platforms):** Australia has moved significant volume of property settlement and lodgement through digital platforms such as PEXA. This shift has been driven by state-level regulatory mandates, with New South Wales, Victoria, Western Australia, South Australia and Queensland all making electronic conveyancing compulsory for most transaction types between 2017 and 2023.[20] The Australian experience demonstrates the productivity benefits of standardised, interoperable settlement processes, and also highlights the importance of governance, resilience and oversight as reliance increases.
- **Singapore (MyInfo):** Singapore's MyInfo platform provides a practical example of consent-led reuse of verified individual attributes, reducing repeated data capture and improving reliability of upstream information sharing.[21] This is relevant to how Open Property may approach permissioned reuse of verified information.
- **Denmark (digital land registration):** Denmark's digitised land registration model is frequently cited as an example of end-to-end digital conveyancing infrastructure, with clear benefits where registration processes are standardised and digitally native.[22]
- **France (property logbook model):** France has made digital property logbooks (the Carnet d'Information du Logement) compulsory for new-build properties, requiring developers to supply construction information, materials records, certification and maintenance instructions. For retrofit works, homeowners are required to create logbooks covering permissions, certification and energy performance impact. Take-up for existing stock remains voluntary and patchy, similar to the UK.[23]
- **European Union (Digital Identity Wallet):** the EU is introducing Digital Identity Wallets under the eIDAS 2.0 framework, enabling individuals to hold and share verified digital credentials across sectors.[24] This demonstrates how reusable digital identity and attribute verification can support trusted information exchange across complex ecosystems, which has relevance for the Open Property model.

Across these international examples, several consistent lessons emerge. Standardisation of data and processes enables measurable improvements in speed, certainty and productivity. Consent-led reuse of verified information reduces duplication and improves data reliability across participants. Strong governance, trust frameworks and clear accountability are critical as reliance on shared data increases. Successful implementations do not depend on a single platform, but on interoperable components operating within a consistent set of standards and assurance mechanisms.

What Open Property Enables in Practice

Open Property enables a shift from static documents, opaque process, and repeated evidence gathering to reusable information flows built on verified data, clear provenance, and secure sharing across participants. In practical terms, it supports:

- Earlier and clearer disclosure of property information
- The ability to rely on digitally verified personal and business identities across the journey
- Reduced duplication of checks and evidence gathering
- Faster progress through routine steps, with attention on exceptions
- Permissioned reuse of verified financial information, such as credit scores, bank statements and payslips
- Improved transparency for consumers and participants
- Stronger fraud mitigation through consistent provenance and auditability

The intention is not to create a single platform, but to enable an ecosystem where different services can interoperate safely. Open Property should be delivered in a way that strengthens existing capabilities already in the market and public sector, rather than creating parallel frameworks or duplicating initiatives.

The aim is a “tell us once” approach for property and transaction information, where reuse is possible because provenance, validation status and permissions are clear.

Value proposition by stakeholder

Open Property creates value by enabling verified information to be reused with clear provenance across participants, reducing friction and uncertainty through better information flows and trusted reuse. These improvements are expected to translate into measurable gains in transaction speed, reduced fall-through risk, lower duplication of effort and improved consumer confidence.

Consumers

- Plain-English summaries of key property facts, material information and transaction status, with supporting evidence available
- Trusted standardised signals (including Red, Amber, Green style indicators) indicating data completeness, verification status and information freshness, with visible provenance
- A single, reusable digital identity and consent experience, reducing repeated form filling and checks
- Clear progress visibility and accountability throughout the home buying journey
- Greater portability of verified information, enabling consumers to reuse trusted data across transactions and services rather than repeatedly resubmitting the same evidence

Conveyancers and legal services

- Earlier surfacing of issues and earlier resolution
- Reduced manual assembly of packs and reduced re-keying
- More consistent inputs that support automation
- Stronger audit trails and defensibility in a tightening consumer protection environment
- Ability to rely on reusable data artefacts that reference verified information, reducing the need to repeatedly collect and validate the same evidence

Lenders and brokers

- Faster and more reliable decisioning for specific components (for example eligibility checks and verification of key attributes)
- Reduced repetition and fewer fragmented customer requests
- More robust explainability and auditability for regulated decisioning
- Reduced expiry-driven repetition where delays cause rework
- Opportunities to drive innovation and efficiencies through AI-powered risk decisioning using verified financial data
- Improved portability of verified financial and property information, supporting more efficient mortgage processing and reducing repeated verification across the lifecycle of a transaction

Estate agents and ecosystem partners

- Clearer expectations for upfront information and fewer issues surfacing late in the transaction
- Improved listing quality and reduced friction in progressing sales
- A more consistent base for PropTech and service providers to innovate
- Opportunities for new services that use interoperable property data, including automation, digital transaction management and AI-enabled customer experiences

Government and public bodies

- Improved fraud resilience and reduced market harm
- Stronger market transparency and consumer protection outcomes
- Improved evidence base for policy and enforcement
- Productivity gains from reduced duplication and improved data quality
- Supporting a more efficient and predictable property market, contributing to economic growth
- Improved ability to monitor market performance through consistent and interoperable data signals

Why Home Buying and Selling is the Flagship Use Case

Home buying and selling brings together consumers, regulated firms, professional services and public data in a single end-to-end journey. If the industry can coordinate Smart Data here, with repeatable patterns for trust, consent, interoperability and delivery, the lessons and repeatable patterns can inform how Smart Data models are deployed in other perhaps less complex, multi-party sectors.

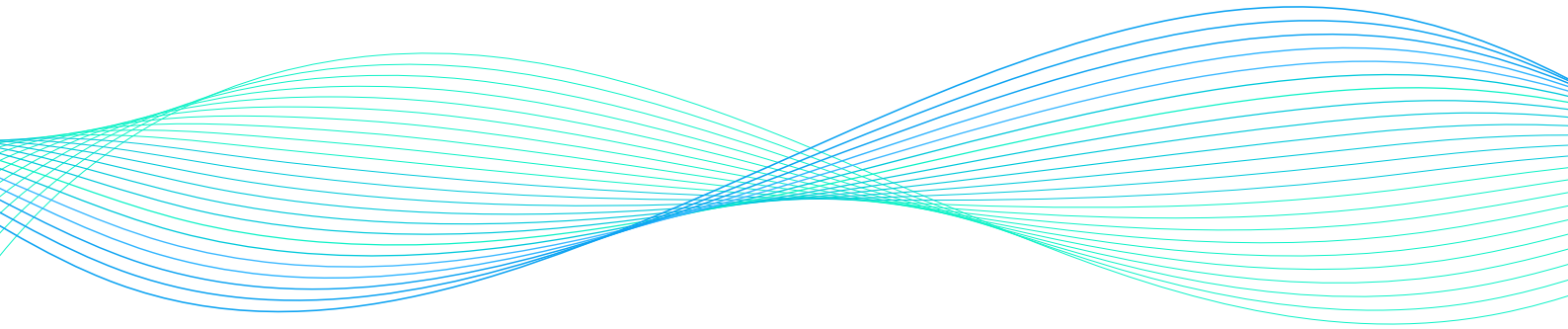
Home buying and selling is an ideal flagship journey because it combines:

- Multiple parties with different incentives and risk obligations
- Multiple hand-offs where information breaks
- High consumer impact and emotional sensitivity
- A dependency on data quality, verification and legal processes
- Clear policy interest in improving speed, certainty and protection

Economic modelling supports this prioritisation, identifying home buying as the highest-value Smart Data use case across sectors, reflecting both the scale of current inefficiencies and the opportunity to unlock measurable economic and consumer benefits.[25]

Implementation Principles

This roadmap should be read alongside MHCLG's home buying and selling reform programme. Open Property could provide a practical route to support those policy ambitions by making trusted information easier to share, verify and reuse safely across the journey. The Coalition will continue to monitor developments so that Open Property remains aligned with evolving policy direction.



Glossary of Terms and Definitions

Term	Meaning
Accreditation (of ATPs)	is the process of assessing and formally approving ATPs for participation in Smart Data schemes, based on the specified eligibility criteria.
Authentication	is the process of verifying the identity of customers or ATPs prior to sharing data.
Authorised Third-party Provider (ATP)	receives customer data through a Smart Data scheme, with the customer's explicit consent, to access and/or process it to provide a service.
Customer protection	measures within Smart Data governance that aim to ensure customer rights are protected, including through clear consent processes, dispute resolution, security standards, and safeguards against misuse of data.
Data security classification	is the process of categorising data types based on their level of sensitivity, to guide decisions around ATP accreditation levels
Data security standards	are requirements that define how data must be protected during storage, transmission, and access. This may include encryption protocols, access controls, and monitoring practices.
Dispute resolution	is a mechanism that enables customers or organisations to resolve disputes arising from data sharing. These may include complaint handling, appeals processes, and formal redress channels.
Governance	is the structured coordination, oversight, and regulation of a Smart Data scheme to enable secure, efficient, and fair use of customer data.
Governance functions	are distinct activities required to successfully govern Smart Data schemes.
Horizontal Digital Integration (HDI)	describes the coordination of data flows, standards and trust mechanisms across the full end-to-end journey, rather than within individual organisations alone. HDI operationalises Smart Data principles and trust frameworks into connected, cross-boundary delivery. It is this coordination that distinguishes Smart Data from conventional digitisation.[26]

Implementation	is the practical delivery and operation of a Smart Data scheme, including setting up governance structures, onboarding participants, deploying technical infrastructure, and ensuring scheme functionality.
Interoperability	is the ability of two or more systems to exchange information and to use the information that has been exchanged. In this context, it is used to describe exchange of information between actors both within and across Smart Data schemes.
Open Property	is the application of Smart Data principles to the property sector, with home buying and selling as the flagship use case for this Coalition's work.
Phase 1	of the Coalition involved forming this roadmap with public and private sector partners, identifying priority use cases, and defining the foundations required for delivery.
Phase 2	of the Coalition focuses on real-world pilots to test adoption, measure outcomes and validate assumptions for scaling.
Regulators	are statutory bodies responsible for overseeing compliance with rules in specific sectors.
Smart Data	refers to the ability for authorised parties to securely access, share and reuse verified information at the right time, with clear provenance, permissions and accountability, within a governed scheme framework.
Smart Data scheme	is the overarching regulatory and technical frameworks that enable secure, standardised sharing of customer data within specific sectors of the UK economy.
Smart Data use case	is the specific, practical applications of datra sharing enabled by Smart Data schemes. Each use case is designed to meet a defined user need and there may be numerous use cases enabled by each Smart Data scheme.
Smart Data Clusters	are coherent sets of data attributes that define what information is required for a specific exchange, how it should be structured, and what trust signals must travel with it. They are the practical unit of reuse in Open Property and are expected to translate into pilot schemas and interfaces in Phase 2.
Standards	are agreed technical or procedural specifications that define how data should be shared, formatted, and secured within Smart Data schemes. These may include technical standards, security standards, and customer experience standards.

Technical standards	are specific technical requirements that underpin Smart Data infrastructure, such as API protocols, encryption specifications, and data formatting conventions.
Trust frameworks	are set of principles, rules, and processes that define how participants in a data sharing scheme can interact safely and securely.
Trust events	are lifecycle signals - issued, verified, updated, expired or revoked – that accompany reusable data and allow downstream parties to assess whether it can be relied upon for the purpose at hand.

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