

Assessment of compliance with the Code of Practice for Official Statistics

Statistics on Homelessness and Rough Sleeping in England

*(produced by the Department for Communities and
Local Government)*

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The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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NATIONAL STATISTICS STATUS

National Statistics status means that official statistics meet the highest standards of trustworthiness, quality and public value.



All official statistics should comply with all aspects of the *Code of Practice for Official Statistics*. They are awarded National Statistics status following an assessment by the Authority's regulatory arm. The Authority considers whether the statistics meet the highest standards of Code compliance, including the value they add to public decisions and debate.

It is a producer's responsibility to maintain compliance with the standards expected of National Statistics, and to improve its statistics on a continuous basis. If a producer becomes concerned about whether its statistics are still meeting the appropriate standards, it should discuss its concerns with the Authority promptly. National Statistics status can be removed at any point when the highest standards are not maintained, and reinstated when standards are restored.

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Foreword

The official statistics on homelessness produced by the Department for Communities and Local Government (DCLG) have the potential to add great value for decision makers but this assessment finds that the presentation of the statistics, as three separate statistical reports with no coherent narrative to draw the statistics together, or to place them in context, diminishes this value. National Statistics status means that the statistics meet the highest standards of trustworthiness, quality and value. The Statutory Homelessness statistics, published as National Statistics, are the most robust of the sets of statistics assessed but in order to retain the National Statistics status, this report requires the statisticians to take some urgent actions, including presenting them in their proper context.

Trusted high quality statistics are important to understanding the scale of homelessness and the characteristics of those people facing homelessness or sleeping rough in England. A range of users, including central and local government, charities and support agencies need this evidence to inform national and local planning of services and investment, and to support democratic debate around policies that impact some of the most vulnerable people in society.

This report concludes that Homelessness Prevention and Relief and Rough Sleeping statistics do not currently meet the standard to be National Statistics. For the Prevention and Relief statistics, it is important to publish them every quarter and for DCLG to consider, as prevention and relief activity has become an increasing focus for all players, how these statistics might be improved to the same standard as the Statutory Homelessness statistics. To this end, I am greatly encouraged that DCLG is now reviewing how it can move quickly towards publishing the official Homelessness Prevention and Relief statistics every quarter (currently annual) alongside Statutory Homelessness as part of an integrated package.

For the Rough Sleeping statistics, this report concludes that there is work to be done in respect of the three pillars of National Statistics - trustworthiness, quality and value - and I consider that the key first step in this will be for the statisticians to demonstrate greater control over decision making around these statistics.

Finally, I recognise that DCLG needs to achieve a great deal with limited resources but I, and my team, have spoken with a wide range of users as part of this assessment and I have been struck by their appetite to work with the statisticians to improve the quality and value of these statistics. I would strongly encourage DCLG to pursue this opportunity and to develop a realistic but ambitious development programme. I have been pleased to hear that the statisticians are keen to build on the outcomes of this assessment and to build a strong dialogue with expert users from across society.

Ed Humpherson

Director General for Regulation, UK Statistics Authority

1 Summary of findings

Introduction

- 1.1 This is one of a series of reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The Act allows an appropriate authority³ to request an assessment of official statistics against the *Code of Practice for Official Statistics*⁴ in order for them to gain National Statistics status. This report is in response to such a request and covers the sets of statistics produced by the Department for Communities and Local Government (DCLG) and reported in:
- *Homelessness Prevention and Relief in England*⁵ (*Prevention and Relief*)
 - *Rough Sleeping in England*⁶ (*Rough Sleeping*)
- 1.2 The Act also gives the Statistics Authority power to re-assess whether the *Code* continues to be complied with in relation to official statistics already designated as National Statistics, and this report also covers the sets of statistics produced by the Department for Communities and Local Government (DCLG) and reported in:
- *Statutory Homelessness in England*⁷ (*Statutory Homelessness*)
- 1.3 The previous assessment of *Statutory Homelessness* was reported in Assessment report 117 in June 2011⁸. The Director General for Regulation considered that it is important to consider the presentation of official statistics about Statutory Homelessness and Prevention and Relief together and that a full re-assessment of *Statutory Homelessness* against the *Code* was appropriate. Section 2 of this report provides further information about the previous assessment.
- 1.4 This report was prepared by the Authority's Assessment team, and approved by the Regulation Committee on behalf of the Board of the Authority, based on the advice of the Director General for Regulation.

Decision concerning designation as National Statistics

- 1.5 The Authority confirms that the statistics published in *Statutory Homelessness* are designated as National Statistics, subject to DCLG implementing the Requirements listed in paragraph 1.12 and reporting them to the Authority by March 2016. This decision by the Authority represents a fine judgement. The Authority considers that the Statutory Homelessness statistics, presented as

¹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

² http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf

³ Subsection 12(7) of the Act defines 'appropriate authority' as Ministers of the Crown, Scottish Ministers, Welsh Ministers, Northern Ireland departments or the National Statistician

⁴ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

⁵ <https://www.gov.uk/government/collections/homelessness-statistics#homelessness-prevention-and-relief>

⁶ <https://www.gov.uk/government/collections/homelessness-statistics#rough-sleeping>

⁷ <https://www.gov.uk/government/collections/homelessness-statistics#statutory-homelessness>

⁸ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/assessment-report-117---statistics-on-housing-in-england.pdf>

they are, without the broader context of increasing local authority (LA) prevention and relief activity, are potentially misleading. However, the Authority notes DCLG's commitment to publishing a better integrated set of statistics about homelessness and acknowledges that there is little opportunity for DCLG to take remedial action before it next publishes. To provide users with some confidence in the direction of travel the Authority expects DCLG to include in *Statutory Homelessness* in December 2015 a plan outlining how and when it will deliver this integrated package of statistics. Please see Requirement 2 (para 3.4) for more details.

- 1.6 The Authority judges that the statistics published in *Prevention and Relief* and *Rough Sleeping* do not fully comply with the *Code of Practice for Official Statistics* in the ways summarised in paragraph 1.12. The Authority judges that the statistics published in *Prevention and Relief* and *Rough Sleeping* cannot be designated as National Statistics until the Authority has confirmed that appropriate actions have been taken by DCLG to meet the Requirements listed in paragraph 1.12. DCLG is expected to report its completed actions to the Authority by July 2016.
- 1.7 DCLG has informed the Assessment team that it has started to implement the Requirements listed in paragraph 1.12. The Authority welcomes this.

Summary of strengths and weaknesses

- 1.8 DCLG's Homelessness and Rough Sleeping statistics are used by a wide range of users as an evidence base for planning, investment and informing democratic debate. The data collections are well established and achieve high rates of response. However, there is evidence that the statistics have not kept pace with changing national and local policy needs and that DCLG has not recognised that LAs, charities and other agencies have been increasingly capturing information that if utilised to produce official statistics, could potentially improve the basis for decision-making. Users told us that the statisticians are very helpful when contacted with questions but most users conveyed a strong appetite for a forum for a continuous proactive dialogue with DCLG about how these statistics can be improved.
- 1.9 The statisticians responsible for these statistics are new to the role and have told us that they are keen to widen their engagement as early as possible. We support this ambition as we consider that DCLG needs to improve and better communicate its understanding of user needs, the context for the statistics, and the strengths and limitations of those statistics (including how the complexities of the data sources impact on their accuracy). Additionally, the team needs to clarify its roles and responsibilities for the statistics, in particular for the Rough Sleeping Count, where much of the decision-making about data collection remains under the leadership of policy officials rather than the statisticians. These are sensitive statistics about some of the most vulnerable in society, where there is perceived incentive for political pressure to be applied locally and centrally. It is therefore critical to the trustworthiness of these statistics that the independent statisticians are visible and have transparent decision making responsibilities.

1.10 DCLG publishes three separate sets of statistics about Homelessness and Rough Sleeping but does not bring them together to provide a more complete and coherent picture for users. It could also do more to draw on other data sources – both official statistics (such as the Census and household surveys) and other sources (for example, LAs and third sector organisations), to extract more value from the statistics and provide a better insight for users. In particular, DCLG collects data to produce Prevention and Relief statistics every quarter but publishes the statistics only annually. It is important to avoiding misleading interpretation of the statistics that *Statutory Homelessness* and *Prevention and Relief* are released as part of an integrated package.

Detailed recommendations

1.11 The Assessment team identified some areas where it felt that DCLG should improve the production and presentation of statistics on Homelessness and Rough Sleeping. Those which are essential for DCLG to address in order to strengthen its compliance with the *Code* and to enable designation as National Statistics are listed – as Requirements – in paragraph 1.12, alongside a short summary of the key findings that led to each Requirement being made. Other recommended changes, which the Assessment team considers would improve the statistics and the service provided to users but which are not formally required for their designation as National Statistics, are listed – as Suggestions – in support of the associated Requirement.

Requirements for designation as National Statistics

1.12 This paragraph includes those improvements that DCLG is required to make in respect of its statistics on Homelessness and Rough Sleeping in order to fully comply with the *Code of Practice for Official Statistics*, and to enable designation as National Statistics.

Finding	Requirement	
<p>The statisticians engage with policy users within DCLG and have a forum for regular engagement with LAs. However, there is a strong appetite among expert users including charities and academics to build a constructive ongoing dialogue with DCLG about these statistics. DCLG should:</p>	<p>1</p>	<ul style="list-style-type: none"> a) Establish effective engagement mechanisms to support a strong continuous relationship with expert users including charities and academia b) Publish more-detailed information about the users and uses of Homelessness and Rough Sleeping statistics and the decisions that they inform c) Clearly explain for users how it ensures that the statistics are produced to high professional standards to inform effective decision-making and democratic

		<p>debate, taking into consideration the Authority's <i>Official Statistics, Performance Measurement and Targets</i></p> <p>d) Publish information about users' experiences of Homelessness and Rough Sleeping statistics and explain how it is responding to what it has learned</p> <p>(para 3.3).</p> <p>In meeting this Requirement, we suggest that DCLG consider how it might usefully build on the contacts established by the Authority as part of this Assessment – for example, by setting up a round table meeting, and we invite DCLG to follow this up with the Assessment team.</p>
<p>DCLG collects the data used to produce <i>Prevention and Relief</i> every quarter but only publishes an annual statistical report. This limits DCLG's scope for presenting a coherent narrative around Statutory Homelessness, Prevention and Relief and might lead to a perception that the statistics are being deliberately withheld. DCLG should:</p>	<p>2</p>	<p>a) Publish Prevention and Relief statistics every quarter alongside Statutory Homelessness as part of an integrated package of homelessness statistics</p> <p>b) Publish plans by December 2015 outlining how and when it will deliver this integrated package of statistics</p> <p>(para 3.4).</p> <p>In meeting this Requirement we suggest that DCLG consider, with users, if a single combined statistical report should replace the separate Statutory Homelessness and Prevention and Relief reports, and publish the rationale for its resulting decision.</p>
<p>The statistics team in DCLG publishes the statistical report for the Rough Sleeping Count but all other aspects of the count are administered by policy colleagues. DCLG should:</p>	<p>3</p>	<p>a) Publish information that clearly sets out the roles and responsibilities for producing Homelessness and Rough Sleeping statistics, including the administration of the Rough Sleeping Count; and describes how DCLG ensures that all parties involved in conducting the Count have a good awareness of their responsibilities in respect of the</p>

		<p><i>Code</i></p> <ul style="list-style-type: none"> b) Demonstrate how it ensures that the Head of Profession for Statistics has the sole responsibility for deciding on the statistical methods, standards and procedures for these statistics c) Review with policy colleagues and with Homeless Link if and how the additional voluntary collection of data as part of the verification process might have impacted the compliance burden for the Rough Sleeping Count and the resulting quality of the statistics and advise users of its judgement d) Consider with Homeless Link and policy colleagues how the additional data collected by Homeless Link might be used for statistical purposes <p>(para 3.6).</p>
<p>DCLG does not publish sufficient detail about the methods for producing Homelessness and Rough Sleeping statistics, or the rationale for the choice of methods, within the context of use. Users have also identified a number of gaps and limitations in the statistics that we consider DCLG should explore. DCLG should:</p>	<p>4</p>	<ul style="list-style-type: none"> a) Publish a detailed account of the methods used to produce Homelessness and Rough Sleeping statistics, and the rationale for the choice of methods within the context of use b) Reflecting on its engagement with users, and the limitations of the statistics, publish a prioritised development plan for Homelessness and Rough Sleeping statistics explaining the rationale for its decisions on priorities <p>(para 3.10).</p> <p>In making this Requirement, we acknowledge the resource constraints faced by DCLG statisticians and so, to aid prioritisation and to manage users' expectations about the pace and scope of development, we suggest that DCLG should consider and communicate developments within the context of three categories; those that:</p> <ul style="list-style-type: none"> a) Could be addressed within the

		<p>constraints of current data collection methods</p> <p>b) Would rely on information not currently collected by DCLG but that is potentially available from LAs and other data sources with minimal additional resource and burden</p> <p>c) Would require investment in a programme of development supported by strategic partnerships</p>
<p>Data on Homelessness and Rough Sleeping are collected and recorded by LAs in a range of different ways. The Rough Sleeping statistics are produced from a mix of actual counts and estimates and there are a number of challenges to accurate recording. DCLG needs to evidence for users its assurance arrangements and its judgements of the strengths and limitations of the statistics. DCLG should:</p>	<p>5</p>	<p>a) Publish information about the strengths and limitations of the Homelessness and Rough Sleeping statistics, including quantifying any potential sources of error and bias and any uncertainty around the estimates</p> <p>b) Publish information about its quality assurance arrangements for the Homelessness and Rough Sleeping statistics that demonstrates a good understanding of the different collection arrangements and their impact on the quality of the statistics.</p> <p>c) Taking into consideration the <i>Authority's Data Quality Assurance Toolkit</i>, detail its judgement about the quality of the statistics, and the rationale for this judgement</p> <p>d) Include CHAIN in its <i>Statement of Administrative Sources</i> and explain for users the strengths and limitations of this administrative data source alongside the statistics (para 3.15).</p> <p>In meeting this Requirement, we suggest that the DCLG team producing the Homelessness, Prevention and Relief statistics talks to its colleagues producing the English Indices of Deprivation about how they have evolved their assurance arrangements.</p>
<p>DCLG publishes a brief narrative in each of the three statistical reports that</p>	<p>6</p>	<p>Improve the value of the Homelessness and Rough Sleeping statistics and aid user interpretation</p>

<p>it produces on homelessness and rough sleeping but it needs to do more to add value by providing insight into the phenomena of homelessness and what can be inferred from the statistics, including integrating different data sources to provide a more complete picture. DCLG should:</p>		<p>by:</p> <ul style="list-style-type: none"> a) Including an enhanced contextual narrative and framework for Homelessness and Rough sleeping statistics, and drawing on other data sources as appropriate to provide a more complete picture of Homelessness and Rough Sleeping in England and to explore possible relationships between changes in patterns and trends of Homelessness and Rough Sleeping with broader changes in the economy and society b) Presenting a regional perspective, including adding harmonised region codes to LA datasets to allow users to easily re-use the data for regional analysis c) Presenting more information about the comparability of the statistics for England with: those presented for the other countries of the UK; and those presented by other organisations such as high profile charities <p>(para 3.21).</p> <p>For <i>Statutory Homelessness and Prevention and Relief</i>, DCLG should consider this Requirement in connection with Requirement 2 of this report.</p> <p>In meeting this Requirement, we suggest that DCLG consider the Authority's <i>Standards for Statistical Reports</i>.</p>
<p>DCLG presents its data tables in Excel format but told us that it is also seeking to increase the amount of data that it releases in open formats. DCLG should:</p>	<p>7</p>	<p>Review, and update where necessary, the formats in which it publishes the data associated with Homelessness and Rough Sleeping statistics. As part of this Requirement it should:</p> <ul style="list-style-type: none"> a) Present time series in the data tables for <i>Rough Sleeping</i> b) Clearly signpost the links to the Excel data tables on the statistical reports html pages to ensure that

		they are accessible to users (para 3.23).
LAs submit data to DCLG via an on-line reporting system. LAs are able to view each other's returns via this system before the official statistics are published. DCLG is reviewing these arrangements. DCLG should:	8	Confirm the arrangements for data sharing with LAs and demonstrate that these arrangements are consistent with the <i>Code</i> (para 3.24).
DCLG publishes a revisions policy but does not explain the nature and extent of any revisions alongside the statistics in <i>Statutory Homelessness and Prevention and Relief</i> . DCLG should:	9	Publish information about the nature and extent of any revisions to the Statutory Homelessness and Prevention and Relief statistics at the same time that they are released (para 3.25).

Subject of the assessment and user views

Introduction

2.1 Homelessness is a much debated topic in the UK and across Europe and has been on the agenda for successive governments for many decades. Individuals and households experience homelessness for a variety of reasons, which include those which relate to the wider state of the economy, or personal factors such as family breakdown, loss of employment, mental illness, or alcohol or drug dependency. Homelessness in England is recognised as affecting some groups of society more than others and can be defined in a variety of ways.

Subject of this Assessment

2.2 DCLG publishes *Statutory Homelessness in England (Statutory Homelessness)* as quarterly National Statistics and *Homelessness Prevention and Relief in England (Prevention and Relief)* and *Rough Sleeping in England (Rough Sleeping)* as annual official statistics.

2.3 *Statutory Homelessness* was previously assessed as part of *Assessment Report 117: Statistics on Housing in England*⁹ in June 2011 and designated as National Statistics in December 2011. The assessment report made three suggestions directly relating to *Statutory Homelessness*. These were to:

- Make information collected about referrals of homeless households to other LAs available to users
- Include more signposting of devolved statistics and some summary comparisons where this would be helpful to users
- Explore the feasibility of collecting record-level data in this important area

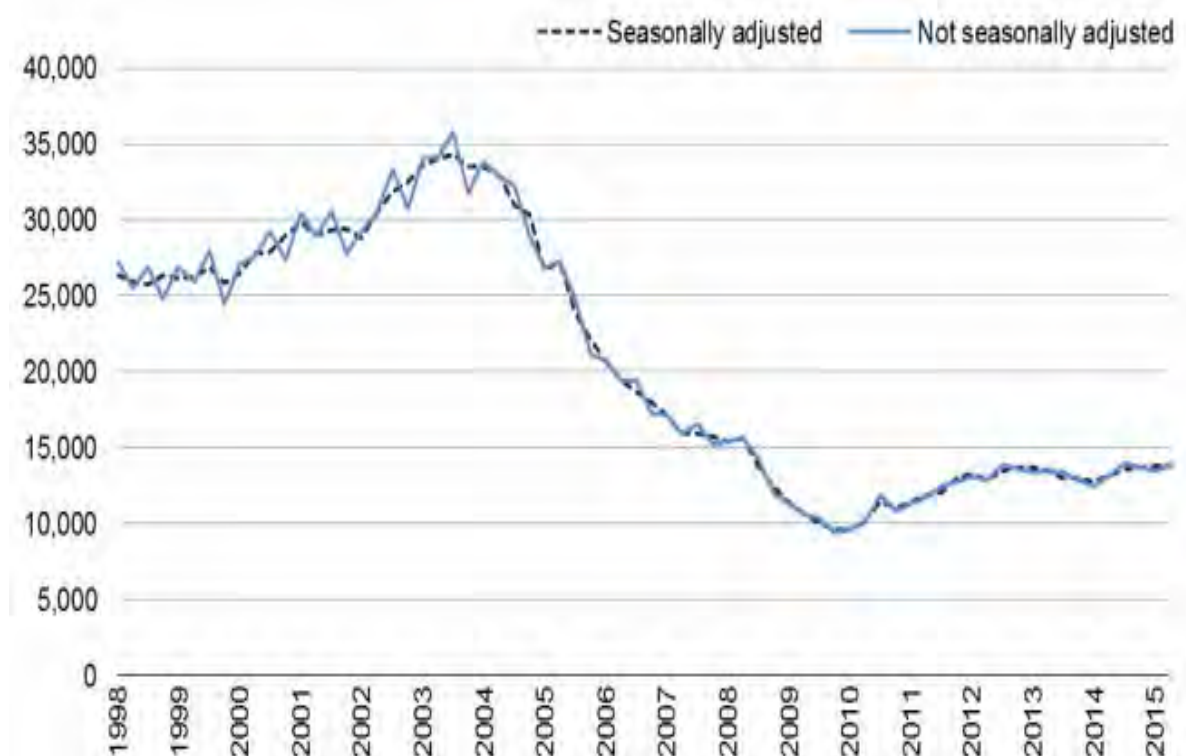
While not referencing these suggestions explicitly, Section 3 of this report considers the latest position with regard to each of these points.

Statutory Homelessness

2.4 DCLG has published statistics on statutory homelessness since 1998. Households that are statutory homeless are those that have submitted a homeless application to an LA, have been accepted as being eligible for assistance, unintentionally homeless, and in one or more priority need groups. Priority need groups include those households with dependent children, pregnant women, or people deemed to be vulnerable in some way. LAs have a statutory homelessness duty to secure accommodation for households in these circumstances. Homeless households in receipt of such support are referred to as acceptances. Figure 1 shows trends in statutory homelessness acceptances since 1998.

⁹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/assessment-report-117---statistics-on-housing-in-england.pdf>

Figure 1: Households accepted by local authorities as owed a main duty to secure settled accommodation each quarter, Q1 1998 to Q2 2015, England

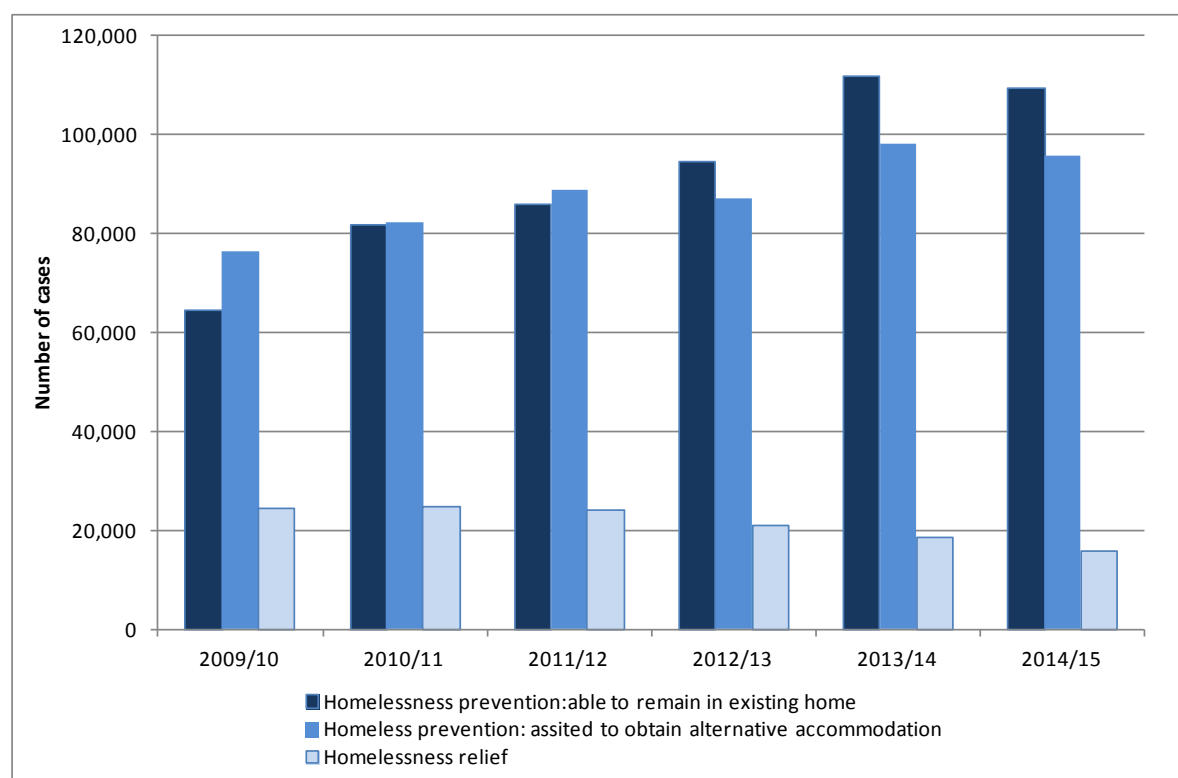


Source: DCLG, *Statutory Homelessness, April to June Quarter 2015, England*

Homelessness Prevention and Relief

2.5 DCLG also publishes *Prevention and Relief*, an annual statistical report produced since 2009/10, about LAs' homelessness prevention and relief activities. Homelessness prevention activities relate to the advice and support given to households by LAs to address housing and other needs, in order to avoid homelessness. Homelessness relief activities are where an authority has been unable to prevent homelessness, but has helped a household to find secure accommodation. LAs do not have a duty to find accommodation for homeless people outside of the statutory homeless definition, but where a household is found to be intentionally homeless, or not in priority need, the authority must make an assessment of the household's housing needs and provide advice and assistance to help it find accommodation. An increasing trend in the volume of LAs prevention and relief cases in recent years can be seen in Figure 2.

Figure 2: Outcome of homelessness prevention and relief activity 2009/10 to 2014/15



Source: DCLG, *Homelessness Prevention and relief: England 2014/15*

Rough Sleeping

2.6 Since 1998, LAs have recorded counts of people found ‘bedded down’ in their areas and submitted these figures to DCLG. DCLG publishes *Rough Sleeping* in February of each year using this information. Since 2010, all LAs have been required to submit a figure to DCLG to indicate the number of people sleeping rough in their area, on a single night of the year between 1 October and 30 November. Since 2010, each LA has been able to choose whether to provide the figure based on either an actual count, or on an estimate. For the purposes of the counts and estimates used to produce *Rough Sleeping*, rough sleepers are defined as:

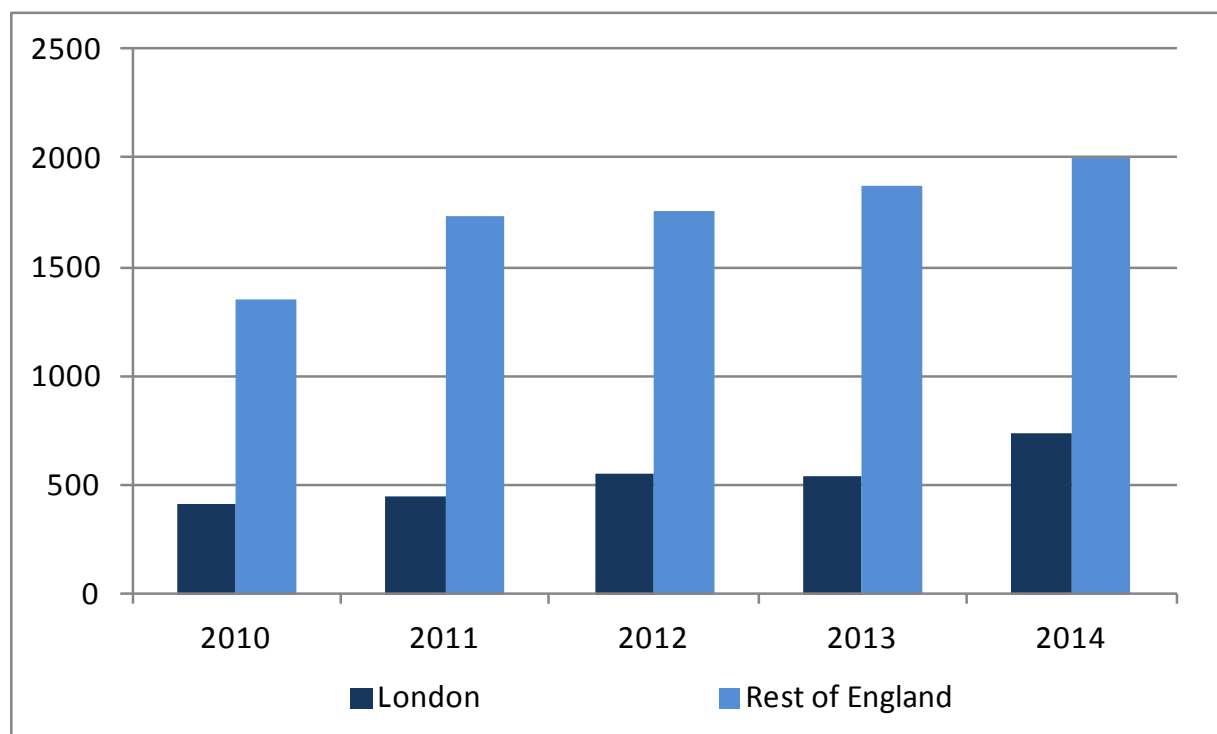
- people sleeping, about to bed down (sitting on/in or standing next to their bedding) or actually bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments)
- people in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or ‘bashes’).

2.7 The definition does not include people in hostels, shelters, campsites or other sites used for recreational purposes or organised protest, squatters or travellers.

2.8 A particular focus of *Rough Sleeping* is on the number of rough sleepers observed in London. *Rough Sleeping* shows that for autumn 2014, London accounts for 27 per cent of the total England figure. It shows that while national

rough sleeping total increased by 14 per cent between 2013 and 2014, the London total increased by 37 per cent over the same period (Figure 3).

Figure 3: Rough sleeping counts and estimates by London and Rest of England



Source: DCLG, Rough Sleeping Statistics England – Autumn 2014

2.9 *Rough Sleeping* also contains some demographic breakdowns for people sleeping rough in London, such as nationality. This detailed information is obtained from the Combined Homelessness and Information Network (CHAIN)¹⁰ database, maintained by the charity, St. Mungo's Broadway. CHAIN records detailed data collected by outreach workers on people found sleeping rough in London. This level of detail is not collected or published for any other LA.

Users and uses

Central and Local Government

2.10 The duty of LAs to homeless people in England is set out in *Part 7 of the 1996 Housing Act*¹¹, updated by *The Homelessness Priority Need for Accommodation (England) Order 2002*¹² and *The Homeless Act 2002*¹³. These laws were further extended by the *Localism Act 2011*¹⁴, which enabled LAs to use the private rental market to discharge their duties to homeless households. Successive governments have introduced further initiatives in an attempt to

¹⁰ <http://www.broadwaylondon.org/CHAIN/Reports/StreettoHomeReports.html>

¹¹ <http://www.legislation.gov.uk/ukpga/1996/52/part/VII>

¹² <http://www.legislation.gov.uk/uksi/2002/2051/contents/made>

¹³ <http://www.legislation.gov.uk/ukpga/2002/7/contents>

¹⁴ <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

tackle homelessness in England. The Ministerial Working Group on Homelessness¹⁵, established in 2010, aims to bring together departments to address both the causes and consequences of homelessness and has published a series of reports including in 2012, *Making every contact count: A joint approach to preventing homelessness*¹⁶. In March 2015 the Working Group published *Addressing complex needs: Improving services for vulnerable homeless people*¹⁷ to report progress against commitments made during the period of the last Parliament and to set the vision for the next Parliament – this report evidences *Statutory Homelessness* and *Prevention and Relief*. It also states that ‘One of the Ministerial Working Group’s first actions was to improve the rough sleeping data collected by LAs’ and says that ‘we now have a more accurate snapshot with information from every LA, allowing us to better understand the extent of rough sleeping in England, and tackle it more effectively on a local level’. DCLG told us that one of the policy uses of *Rough Sleeping* is to highlight emerging increases in numbers of rough sleepers in a particular area that it can then follow up immediately with the LA concerned and Homeless Link to see how any problems might be addressed.

- 2.11 Statistics on Statutory Homelessness, Prevention and Relief and Rough Sleeping are regularly mentioned in Hansard reports. There have also been various Parliamentary questions and debates around the subject in recent months. These have focused on the vulnerable groups in society that are more likely to find themselves homeless or sleeping rough (such as people with mental illnesses or the unemployed) and discussions around related housing and private rental sector policies. The House of Commons Library published several relevant reports in 2015, including *Homelessness in England*¹⁸ and *Rough Sleeping (England)*¹⁹, which set out some of the known causes and initiatives surrounding homelessness and rough sleeping in England.
- 2.12 LAs use the official statistics to provide a national context for their own data and for benchmarking against each other. LAs we spoke with said that homelessness prevention and relief and the numbers of people in temporary accommodation are key policy issues for LAs. Some LAs told us that they share the data with neighbouring LAs, and with LAs with similar characteristics and some LAs have created local networks to share information and promote good practice around measuring homelessness, prevention and relief activity and rough sleeping.

Charities and academics

- 2.13 Charities require statistics about the scale and nature of Homelessness and Rough Sleeping to provide an evidence base for campaigning on behalf of the groups that they provide a voice for – different charities tend to have a specific focus: a particular region; young people; single people; families and so on. They use the statistics to monitor and assess the impact of government policies – for example, with respect to Universal Credit and housing benefits, and also

¹⁵ <https://www.gov.uk/government/collections/ministerial-working-group-on-preventing-and-tackling-homelessness>

¹⁶ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7597/2200459.pdf

¹⁷ <https://www.gov.uk/government/publications/addressing-complex-needs-improving-services-for-vulnerable-homeless-people>

¹⁸ <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN01164>

¹⁹ <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN02007>

the success of central and local government initiatives to reduce homelessness – increasingly prevention and relief activities. Charities also need data to inform where they might best invest their funds and efforts to best contribute to tackling homelessness and to understand where the need is greatest for both their services and the partner organisations that they work with.

- 2.14 Non-government publications have been influential in exploring homelessness. For example, The Homelessness Monitor is a five-year study (2011-2015) funded by Crisis and the Joseph Rowntree Foundation (with research by Herriott-Watt University, the University of York and the University of New South Wales) looking at the impact of economic and policy developments on homelessness. The study has produced a series of reports about England, Wales, Scotland and Northern Ireland²⁰. *Homelessness Monitor: England 2015*²¹ adopts a wide definition of homelessness taking account of: people sleeping rough; single homeless people living in hostels, shelters and temporary supported accommodation; statutorily homeless households; and those aspects of ‘hidden homelessness’ amenable to statistical analysis using large-scale surveys, namely ‘concealed’, ‘sharing’ and ‘overcrowded’ households.
- 2.15 Some charities bring together statistics and data about homelessness for wider use – for example: the Shelter Housing Databank²² ‘brings together government data on housing need, supply, affordability and other issues at a local, regional and national level’; and Centrepoint is developing a Youth Homelessness Digital Databank with data dashboards²³ to ‘help all of us better understand numbers of young people experiencing homelessness, why young people become homeless and the impact of services region by region’.

International

- 2.16 The European Observatory on Homelessness publishes *The Journal of European Homelessness*²⁴ twice a year and numerous articles and papers related to homelessness in Europe. One example of its work is the series of publications on *The Extent and Profile of Homelessness in European Member States*²⁵. The most recent update was published in December 2014 and was based on input to a questionnaire on homelessness that was sent to 15 EU member states including the UK. The report gives an overall view of the causes and trends of homelessness in addition to the difficulties in agreeing definitions and measuring the extent of homelessness in different member countries, especially where comparisons are to be made.

User views

- 2.17 As part of this assessment we spoke with a range of users from central government, local government, academia and charities representing and working with homeless people. Users told us that they want statistics to help

²⁰ <http://www.crisis.org.uk/pages/homelessnessmonitor.html>

²¹ http://www.crisis.org.uk/data/files/publications/Homelessness_Monitor_England_2015_final_web.pdf

²² http://england.shelter.org.uk/professional_resources/housing_databank

²³ <http://centrepoint.org.uk/google>

²⁴ <http://www.feantsaresearch.org/spip.php?rubrique19>

²⁵ http://www.feantsaresearch.org/IMG/pdf/feantsa-studies_04-web2.pdf

them answer different types of questions and provided some feedback about how well DCLG's Homelessness and Rough Sleeping statistics provide those answers:

What is the scale of homelessness and rough sleeping in England?

- Users want the official statistics to provide a more complete picture of homelessness and rough sleeping, and to present greater context and insight about what the statistics do and do not represent – users said that the current arrangement for presenting and discussing each set of statistics separately without reference to each other, or to other sources, is unhelpful and potentially misleading. One international user told us that ‘there is no actual measure of homelessness in England’ and ‘the challenge in using the Statutory Homelessness statistics for England is that they focus on a narrow section of the homeless population
- Users told us that while the statistics for Statutory Homelessness, in particular, are well established, they consider that the presentation of the statistics has not kept pace with changes in policy – they said they felt that the increasing focus by LAs on prevention and relief activities in the last ten years means that it does not make sense to present *Statutory Homelessness* and *Prevention and Relief* separately. Users also said that they would like *Prevention and Relief* to be published more frequently than annually – the data are collected quarterly
- Most users who we spoke with told us that they felt that it is important that there are trusted transparent robust official statistics about the numbers and characteristics of people who are sleeping rough in England, as these are a particularly vulnerable group of society. However, most users questioned the accuracy of the count and some considered that in its current form it is not a helpful tool for analysis – a key limitation identified by users is that the count only represents a simple annual snapshot of the numbers of people sleeping rough on (or around) a particular night. For example, users said that there is insufficient information available to make a judgement about the government's No Second Night Out policy²⁶
- Users told us that they felt that DCLG should explore how it might improve its rough sleeping statistics, for example by engaging better with charities and agencies with outreach workers about what they collect – one user said that they had yet to meet someone who was sleeping rough who had not been in contact with one of the agencies. Other suggestions included: exploring whether the CHAIN model could be extended beyond London; reviewing what relevant administrative datasets are available from organisations like DWP and the NHS; reviewing academic and research studies carried out; and speaking to the Welsh Government about the changes that it is making to its rough sleeping statistics. Users, however, recognised the costs associated with developing some of these different options and said that DCLG should consider those costs in relation to the benefits of any enhanced statistics. One user said that rolling out CHAIN across England may not be a proportionate approach but it may bring benefits for large cities. Some users considered that more benefits would

²⁶ No Second Night Out was devised by the Mayor of London and subsequently rolled out across England: <https://www.gov.uk/government/publications/vision-to-end-rough-sleeping--2>

come from investing in Prevention and Relief statistics than in the Rough Sleeping Count

- Users consider that the limitations of the Homelessness and Rough Sleeping statistics are compounded by DCLG not explaining sufficiently for users the methods used to produce the statistics, their strengths and limitations, or its assurance arrangements. A number of users, including those who also supply the data, raised concerns about DCLG's arrangements for validating the data collected by LAs. For the Statutory Homelessness, Prevention and Relief statistics, they told us that LAs use different recording systems, some of which are more flexible than others, leading to differences in the quality of the data that can be extracted. However, we heard from some users and LAs about improvements that they are introducing to their data recording, about additional information that they now hold (above what they supply to DCLG) and about increased networking across LAs to deliver common solutions
- Users said that while DCLG does clearly explain that the estimates included in *Rough Sleeping* are likely to be an undercount, there are a number of potential sources of error and bias that DCLG does not explain or quantify the impact of. For example: LAs employ different methods to count and increasingly estimate numbers of rough sleepers and these methods are of mixed quality; the time that the count is taken means that some groups are less likely to be 'bedded down' for the night – one user said that women tend to be moving about later into the night for safety reasons; people who are rough sleeping often don't want to be found; it is difficult to conduct counts in some areas for safety reasons – such as empty buildings and underneath motorway flyovers; and the coverage of large rural areas is difficult
- Users said that they have ideas about how to optimise the data currently collected and looking ahead, how to better collect and present statistics about Homelessness and Rough Sleeping. Users we spoke with were generally pragmatic in understanding that DCLG statisticians work within resource constraints but considered that a better working relationship with charities, academics and LAs would help identify opportunities for short-term improvements to the statistics supplemented by a more strategic development programme. User said that they are very keen for more proactive and continuous engagement by DCLG statisticians with expert users

What are the characteristics of people and households that are facing homelessness, homeless or sleeping rough in England? How does homelessness impact different demographic groups – for example, young people, single people, families, EU and non-EU nationals migrating to the UK?

- Users said that they felt it would be helpful if DCLG could review some of the variables that it collects for *Statutory Homelessness* to confirm if the breakdowns might be improved. Users said that if the age groupings could be broken down further, particularly for younger people, it would help them in assessing the impact of policies that apply age criteria such as Universal Credit. Users also said that reductions in the equalities information

collected and presented by DCLG – such as collecting less detailed ethnicity groupings – has impacted the relevance of the statistics

- Some users said that a key limitation of the Homelessness statistics is the coverage of single homeless people – these people are more likely to be covered in Prevention and Relief statistics but these statistics are less detailed and less frequently published than the Statutory Homelessness statistics. Users said that it would be helpful if *Prevention and Relief* included the same types of variables collected for *Statutory Homelessness* about the characteristics of the people involved in recorded cases. One user said that it would like DCLG to consider if it can publish more of the data that it collects as part of the P1E form – such as information about household size
- Users also said that the rough sleeping count does not offer any information about the characteristics of people, except for London where *Rough Sleeping* draws on additional information from the CHAIN database (commissioned by GLA from DCLG funding)

How do patterns in homelessness and rough sleeping differ regionally and locally?

- Users told us that they felt that it is important that the official statistics offer better insight about regional patterns and trends, and that DCLG should, at the very least, add region codes to the data to facilitate re-use for such analysis. They said that this should be possible as DCLG collects and presents data for each LA in England

What is the relative success of different prevention and relief activities? What is the scale of repeat homelessness?

- Users said they felt that it is important for DCLG to present the legislative context for the statistics and for users to understand the different routes that a household can and cannot take through LA services, and services provided by other organisations – and the fact that people can be going through more than one route at the same time – to better understand the supply and demand for those services. For example, they said that DCLG needs to make it clearer that while *Statutory Homelessness* is a helpful measure because it explains something about the demand for LA services it is not a complete measure for a number of reasons. For example: users told us that those households that would not meet the criteria for being a ‘priority needs’ group are less likely to submit applications to the LA as they might be aware/advised that their cases will not be accepted. Single households without rights to housing would not be represented in Statutory Homelessness statistics and are more likely to go through the prevention route. Homeless young people housed through children’s social care services are also missing from the statistics
- Users said that the amount of prevention and relief cases that an LA deals with will not only be driven by demand – it will be constrained by what resources that the LA has available. Users, including some LAs, told us that an increasingly important aspect to their activity relates to providing expert advice to people, many of whom then take action themselves rather than pursue formal routes. Users said that the official statistics do not include

these advisory services and there is almost no data about the number of people refused assistance or the characteristics of those who have their housing applications denied. Users also said that they felt that there is a lack of information around hostels, bed and breakfasts and other types of temporary accommodation; and about movements across LAs – for example, to understand if people are moving from one LA to another to get accommodation and then migrating back

- Charities said that they felt that improving the coverage of the statistics would provide a better and more transparent evidence base for central and local government planning and would allow all users to monitor more effectively the impact of government policies on homelessness. They said that they felt better statistics would also inform better decisions by charities about where and how to invest their funds in accommodation and services to greatest effect. Users that we spoke with told us that in addition to their own research and surveys, they currently have to supplement what is available from official statistics with Freedom of Information Act requests to LAs and generally recognised that this is not ideal for any of the parties involved
- While recognising that the policy framework for addressing homelessness in Scotland is different to that in England, a number of users suggested that DCLG should review how the Scottish Government produces statistics about statutory homelessness, prevention and relief. They told us that they consider that its integrated systems that support linking of information by household offer a number of advantages for users to help with planning and reviewing the success of different policies including prevention and relief activities. For example, the statistics in Scotland offer a better picture of repeat homelessness, and the reasons for it – users said that they consider this an important gap in the statistics for England

What are the reasons for homelessness?

- Users told us that they consider that, historically, one of the most important fields collected about homelessness has been the reason for homelessness. However, this type of information is not recorded for prevention and relief cases and some users said that the types of reason for homelessness have changed in recent years and so the categories might need to be refreshed.

Methods and sources

Statutory Homelessness, Prevention and Relief

2.18 LAs report their statutory homelessness and homelessness prevention and relief activities to DCLG quarterly, by submitting a P1E form²⁷. The form asks LAs about statutory homelessness in their area and collects data on their activities in respect of this area such as decisions made on applications. *Statutory Homelessness* is published around 50 working days after the end of each quarter and *Prevention and Relief* is published annually. The P1E returns

²⁷https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443712/Copy_of_P1E_form_for_Q2_2015.xls

are validated and cross-checked by DCLG with anomalies being verified directly with the LA concerned. DCLG imputes for missing values.

Rough Sleeping

- 2.19 DCLG launched a consultation on changes to the rough sleeping methodology in 2010. Following the consultation, a new methodology was applied²⁸ from 2010 onwards. This allowed LAs to submit an estimate in conjunction with voluntary sector partners rather than carry out an actual count of rough sleepers. Each LA now decides whether to either carry out a count or to provide an estimate of numbers of people sleeping rough on the night in question. The definition of rough sleeper was also extended from 2010 to include those 'about to bed down'. Due to these changes in methodology, the time series is available only from 2010 onwards. Homeless Link²⁹ verifies all LA counts and estimates. Homeless Link produces a toolkit³⁰ for LAs to use when carrying out the counting or estimating for their area. In addition to the toolkit and verification, Homeless Link provides support in planning and carrying out the count or estimate, provide training and support to verifiers and carry out assessment needs for rough sleepers.

Statistics for Wales, Scotland and Northern Ireland

- 2.20 Scottish Government publishes National Statistics: *Operation of the Homeless Persons Legislation in Scotland, Homelessness in Scotland: Quarterly Update* and introduced experimental official statistics in 2015: *Housing Options (PREVENT1) Statistics in Scotland*³¹. Scottish Government is currently reviewing the frequency of these publications.
- 2.21 Welsh Government publishes quarterly National Statistics: *Homelessness*³² which includes information on the number of households applying to local authorities for housing assistance under the Housing Wales Act 2014 and the number of homeless households in temporary accommodation. Welsh Government has not previously carried out regular annual rough sleeping counts in Wales. The last one night count was carried out in March 2008³³. However, Welsh Government is due to introduce a regular annual rough sleeper count in Wales from November 2015.
- 2.22 Department for Social Development Northern Ireland presents statistics about homelessness in Northern Ireland as part of quarterly National Statistics: *Northern Ireland Housing Bulletin*³⁴.

²⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6009/1713784.pdf

²⁹ <http://www.homeless.org.uk/>

³⁰ <http://www.homeless.org.uk/sites/default/files/site-attachments/Counts%20%26%20Estimates%202014%20Introduction.pdf>

³¹ <http://www.gov.scot/Topics/Statistics/Browse/Housing-Regeneration/RefTables>

³² <http://gov.wales/statistics-and-research/homelessness/?lang=en>

³³ <http://gov.wales/statistics-and-research/national-rough-sleeping-count/?lang=en>

³⁴ <https://www.dsdni.gov.uk/publications/northern-ireland-housing-bulletin-january-march-2015>

Accessibility and costs

- 2.23 DCLG publishes *Statutory Homelessness, Prevention and Relief* and *Rough Sleeping* in PDF format, with supplementary data tables published in Excel format. DCLG publishes some selected tables for *Statutory Homelessness* in open data formats. This equates overall to a level of two stars under the Five Star Scheme that forms part of the Open Standards Principles proposed in the *Open Data White Paper: Unleashing the Potential*³⁵ and adopted as UK government policy in November 2012³⁶. Five stars represents the highest star rating within the Scheme.
- 2.24 DCLG estimates that its own costs of producing *Statutory Homelessness, Prevention and Relief* and *Rough Sleeping* are approximately £120 thousand per year. DCLG estimates that the cost to LAs of data collection is approximately £773 thousand per year for *Statutory Homelessness* and *Prevention and Relief* and approximately £24 thousand per year for *Rough Sleeping*³⁷.

³⁵ http://data.gov.uk/sites/default/files/Open_data_White_Paper.pdf

³⁶ <https://www.gov.uk/government/publications/open-standards-principles/open-standards-principles>

³⁷ http://www.neighbourhood.statistics.gov.uk/HTMLDocs/OLGSS/OLGSS_interactive.html

3 Assessment findings

User engagement

- 3.1 DCLG has published a user engagement strategy³⁸ that explains its range of mechanisms for engaging with users of its statistics, including Homelessness and Rough Sleeping statistics. However, while DCLG periodically hosts large user events to discuss a wide range of topics – the last one was in 2013³⁹, DCLG told us that it does not engage widely with users of *Statutory Homelessness, Prevention and Relief and Rough Sleeping* – for example, with charities and academics, except in response to direct enquiries and its open invitation in the statistical reports for users to provide feedback. DCLG told us that the statisticians have good working relationships with policy colleagues within the Department and that it liaises regularly with LAs about these statistics through the CLIP Housing Statistics Sub-Group⁴⁰. However, while we found that there was evidence of day-to-day routine engagement to provide briefing for Ministers, answer Parliamentary Questions and to refine guidance notes for LAs, we did not get a sense of any strategic discussions with these users that would assure the ongoing value and relevance of the statistics.
- 3.2 DCLG presents some helpful information about the users and uses of the statistics, in the engagement strategy and in the statistical reports, but does not illustrate their specific applications or make it clear if the statistics are suitable for that use. As discussed in paragraph 2.10 of this report, the Ministerial Group on Homelessness report: *Addressing complex needs: Improving services for vulnerable homeless people*⁴¹ discusses the importance of having an accurate snapshot of rough sleepers, implying reference to the official statistics. However, the report does not then go on to use those statistics, instead referencing non-official sources to discuss changes in patterns of rough sleeping. Might this suggest that the official statistics about rough sleeping in England are not meeting a primary need? We consider that DCLG needs to provide more clarity about the types of decisions that the official statistics inform, including any performance measures, and about the uses of the statistics outside government – including its assessment of how well the statistics serve these uses. DCLG does not publish information about users' experiences of the statistics.
- 3.3 During the course of this assessment we discovered that there is a strong appetite among expert users, including charities and academics, to build a constructive ongoing dialogue with DCLG about these statistics. DCLG told us that the statisticians responsible for the Homelessness and Rough Sleeping statistics have been cautious in the past about engaging with users that campaign around government policy but said that the new team is keen to build relationships with a broader range of users. We encourage DCLG in this ambition. We consider these relationships critical to DCLG's understanding

³⁸ <https://www.gov.uk/government/publications/engagement-strategy-to-meet-the-needs-of-statistics-users>

³⁹ <http://www.statsusernet.org.uk/events/eventdescription?CalendarEventKey=bd5e1432-7fb7-497c-826b-a63ce3b93544>

⁴⁰ The minutes of CLIP meetings are available from KnowledgeHub if registered to the site:

<https://khub.net/group/guest/my-activity>

⁴¹ See footnote 17

user needs and maintaining the relevance of the statistics. We also consider that these expert users represent a valuable asset for DCLG in seeking to produce high quality National Statistics. As part of the designation as National Statistics, DCLG should:

- a) Establish effective engagement mechanisms to support a strong continuous relationship with expert users including charities and academia
- b) Publish more detailed information about the users and uses of Homelessness and Rough Sleeping statistics and the decisions that they inform
- c) Clearly explain for users how it ensures that the statistics are produced to high professional standards to inform effective decision-making and democratic debate, taking into consideration the Authority's *Official Statistics, Performance Measurement and Targets*⁴²
- d) Publish information about users' experiences of Homelessness and Rough Sleeping statistics and explain how it is responding to what it has learned⁴³

(Requirement 1).

In meeting this Requirement, we suggest that DCLG consider how it might usefully build on the contacts established by the Authority as part of this Assessment – for example, by setting up a round table meeting, and we invite DCLG to follow this up with the Assessment team.

Decisions about the methods, procedures and timing of official statistics

3.4 Following the introduction of the *Homelessness Act 2002*⁴⁴, central government increasingly encouraged local housing authorities to place greater emphasis on the prevention of homelessness. Around 2004, there was a further policy development and authorities were encouraged to strengthen their prevention activity by providing a comprehensive 'housing options' service for everyone seeking help with accommodation problems. These policy developments appear to have led to the dramatic fall in the number of households accepted by LAs as requiring assistance indicated by figure 1 in para 2.4 of this report. DCLG introduced Prevention and Relief statistics in 2008 to reflect this shift in policy. DCLG collects the data used to produce *Prevention and Relief* every quarter as part of the same collection used to produce *Statutory Homelessness* but it only publishes the Prevention and Relief statistics annually for each financial year. DCLG told us that it does not know what the rationale was for this decision and that, during the course of this Assessment, it has started to review its procedures with a view to publishing these statistics every quarter. The Authority welcomes this decision. We consider that the current arrangements do not demonstrate due respect for the burden on LAs to provide these data every quarter. Publishing a separate annual statistical report also limits DCLG's scope for presenting a coherent narrative around Statutory

⁴² <http://www.statisticsauthority.gov.uk/assessment/monitoring/monitoring-reviews/monitoring-review-3-2015---official-statistics--performance-measurement-and-targets.pdf>

⁴³ In relation to Principle 1, Practices 1, 2 and 5 and Principle 4, Practices 2 and 3 of the *Code of Practice*

⁴⁴ <http://www.legislation.gov.uk/ukpga/2002/7/contents>

Homelessness, Prevention and Relief – the lack of a clear rationale for which might lead users to perceive that the statistics are being deliberately withheld. As part of the designation as National Statistics, DCLG should:

- a) Publish Prevention and Relief statistics every quarter alongside Statutory Homelessness as part of an integrated package of homelessness statistics
- b) Publish plans by December 2015 outlining how and when it will deliver this integrated package of statistics⁴⁵

(Requirement 2).

In meeting this Requirement we suggest that DCLG consider, with users, if a single combined statistical report should replace the separate Statutory Homelessness and Prevention and Relief reports, and publish the rationale for its resulting decision.

- 3.5 The collection of the data for *Rough Sleeping Count* is administered by a policy team and not by the statisticians. This includes: issuing the data collection spreadsheets and guidance notes to LAs; contacting them to advise them of the timing of the count and subsequently chasing returns until it has received 100 per cent response; and administering the contract with Homeless Link which also provides guidance for LAs, including webinars, and verifies every LA return – by attending counts or sitting on verification panels. The DCLG policy team performing this function told us that it was not sure of the rationale for this arrangement but that it has been in place for a number of years. The policy team told us that, together with Homeless Link, it starts to liaise with LAs in August each year. It said that the statisticians are usually first involved from October when they help to set up the database ready to record the data returned by the LAs. The policy team then works with the statisticians to quality assure the data and the statisticians produce the statistical report.
- 3.6 Most of the team producing Homelessness and Rough Sleeping statistics have newly joined in 2015 and so have not yet been involved with a count. However, we were concerned to discover that the statisticians had not been aware that arrangements for the 2015 count had started and were not consulted about the guidance notes that are made available from the official statistics section of DCLG's website (and which have not changed since 2010)⁴⁶. The statisticians do not have a direct relationship with Homeless Link or with the LAs that provide the data. The statisticians were not included in DCLG's decision to allow Homeless Link, when accompanying LAs to verify counts, to collect additional data on a voluntary basis for their own purposes about the age, gender and nationality of the people counted. DCLG agreed that Homeless Link does not need to share this data with them for statistical purposes. To comply with the *Code*, DCLG must demonstrate that the Head of Profession for statistics has the sole responsibility for deciding on statistical methods, standards and procedures and we consider that with the current arrangements he is not able to do so for the Rough Sleeping Count. As part of the designation as National Statistics, DCLG should:

⁴⁵ In relation to Principle 1 Practice 4; Principle 3 Practice 3; Principle 7 Practice 5; Principle 8 Practice 2; and Protocol 2 Practice 1 of the *Code of Practice*

⁴⁶ <https://www.gov.uk/government/publications/evaluating-the-extent-of-rough-sleeping--2>

- a) Publish information that clearly sets out the roles and responsibilities for producing Homelessness and Rough Sleeping statistics, including the administration of the Rough Sleeping Count; and describes how DCLG ensures that all parties involved in conducting the Count have a good awareness of their responsibilities in respect of the *Code*
 - b) Demonstrate how it ensures that the Head of Profession for Statistics has the sole responsibility for deciding on the statistical methods, standards and procedures for these statistics
 - c) Review with policy colleagues and with Homeless Link if and how the additional voluntary collection of data as part of the verification process might have impacted the compliance burden for the Rough Sleeping Count and the resulting quality of the statistics and advise users of its judgement
 - d) Consider with Homeless Link and policy colleagues how the additional data collected by Homeless Link might be used for statistical purposes⁴⁷
- (Requirement 3).

Methods and quality

- 3.7 Each of the three statistical reports includes clearly signposted technical notes and definitions. The technical notes sections briefly explain the methods used to produce the statistics, including: any imputation and estimation for missing values; seasonal adjustment; and rounding policy. Users told us that they would like more-detailed information about methods. DCLG does not generally explain the rationale for the choices of methods or how the choices impact on the use of the statistics – for example, *Statutory Homelessness* rounds to the nearest 10 and *Prevention and Relief* to the nearest 100.
- 3.8 *Statutory Homelessness, April to June 2015* pre-announced that when it next publishes, it will no longer present seasonally adjusted time series in the statistical report as analysis carried out confirmed that while historically the time series had a significant seasonal component, there is little evidence of seasonality in the more recent data. While it is very helpful for users that DCLG has pre-announced this change to methods, we consider that it would have been helpful if it had presented a summary of its analysis and discussed what might have influenced this change in the pattern of the data. For example, it might relate to the shift towards prevention and relief activity in recent years, in which case this might be a factor to consider when DCLG starts to publish quarterly Prevention and Relief statistics.
- 3.9 As part of this assessment, users identified a range of limitations in the statistics, including gaps that they would like to see addressed. The views of the users that we spoke to are detailed in Section 2 of this report, and we encourage DCLG to reflect on all the points raised and talk further to users, but some key points that we consider DCLG should turn its attention to are:
- With the increasing focus by LAs on prevention and relief activity, there is a need for equivalent information to be collected in relation to these statistics

⁴⁷ In relation to Principle 3 Practice 4; Principle 6 Practice 4; and Principle 7 Practice 6 of the *Code of Practice*

as for Statutory Homelessness – for example, characteristics of households and reasons for potential homelessness. *Homelessness Monitor: England 2015*⁴⁸ included criticism of the official statistics about Statutory Homelessness, Prevention and Relief as ‘Councils in England have been changing the way they deal with homelessness and have become increasingly reliant on more ‘informal’ responses that are recorded separately – such as financial assistance and debt advice, assistance to stay in a tenancy or family mediation’. LAs offering these advisory services confirmed to us that they are not covered by the official statistics. We consider that their inclusion might offer a more complete picture of the supply and demand for homelessness services.

- Better integrating systems for collecting information about Statutory Homelessness and Prevention and Relief would have the potential to offer greater insight into the reasons for homelessness and the relative success of different prevention and relief activities – for example, by offering a greater understanding of repeat homelessness. DCLG could usefully explore how equivalent data are collected elsewhere to see what lessons might be learned, for example, by liaising more closely with official statisticians in other countries of the UK. In December 2001, Scottish Government changed to a case-based data collection system (HL1) to provide more detailed information on applications by individual households. This has allowed cases to be registered and updated on a continuous basis, as well as enabling applications made by the same household to be linked, so facilitating analysis by individual households and the identification of repeat applications. In October 2014, Scottish Government introduced a measurement tool for homelessness prevention work based on a new PREVENT1 collection. Welsh Government changed its data collection arrangement after the Housing (Wales) Act 2014 became law in Wales, including a number of changes to homelessness legislation aimed at reducing levels of homelessness, by placing its prevention at the centre of local authority duties
- The simple nature of the Rough Sleeping Count means that it has its limitations as an evidence base – issues around the accuracy of the count are discussed in paragraph 3.13 but we consider that DCLG should also consider if and how it could develop the value of these statistics further in relation to their use. For example, through more continuous measurement and a better understanding of the characteristics of rough sleepers

3.10 As part of the designation as National Statistics, DCLG should:

- a) Publish a detailed account of the methods used to produce Homelessness and Rough Sleeping statistics, and the rationale for the choice of methods within the context of use
- b) Reflecting on its engagement with users, and the limitations of the statistics, publish a prioritised development plan for Homelessness and

⁴⁸ See footnote 21

Rough Sleeping statistics explaining the rationale for its decisions on priorities⁴⁹

(Requirement 4).

In making this Requirement, we acknowledge the resource constraints faced by DCLG statisticians and so, to aid prioritisation and to manage users' expectations about the pace and scope of development, we suggest that DCLG should consider and communicate developments within the context of three categories; those that:

- a) Could be addressed within the constraints of current data collection methods
- b) Would rely on information not currently collected by DCLG but that is potentially available from LAs and other data sources with minimal additional resource and burden
- c) Would require investment in a programme of development supported by strategic partnerships

3.11 DCLG provides LAs with guidance notes about how to complete its P1E returns for Statutory Homelessness, Prevention and Relief⁵⁰ and the Rough Sleeping Count⁵¹ and it provides users with a link to these guidance notes within the statistical reports. *Statutory Homelessness* and *Prevention and Relief* both present summary information about the assurance checks that DCLG and LAs apply to the data. When they submit data to DCLG, LAs must provide details of the checks that they undertake – DCLG states that these can include internal and external audits, and both periodic and random data checks on the data. We consider that it is good practice that DCLG collects this information from LAs but we think that it would be helpful if it shared more information with users about these assurance arrangements, within the context of how this informs DCLG's judgement about the quality of the statistics.

3.12 DCLG also presents unit and item response rates alongside the statistics – in the quarter to 30 June 2015 DCLG reported that 99.4 per cent of LAs returned data for *Statutory Homelessness* and 97 per cent of the cells used to produce *Statutory Homelessness* were completed. For Prevention and Relief DCLG reported a 96.9 per cent LA response rate with 0.6 per cent of LAs returning partial data. DCLG advises that typically the lowest levels of response from LAs have been for the sections about 'households leaving temporary accommodation or other temporary arrangements' and 'unsuccessful prevention and relief activity' – both of these are topics that users told us are of high interest. DCLG said that it removed the question about 'unsuccessful prevention and relief activity' from the latest data collection but does not explain the rationale for this, nor does it say what it is doing to improve the data returned about 'households leaving temporary accommodation or other temporary arrangements'. *Prevention and Relief* cautions users that it is possible that the statistics under-record activity as some LAs do not record comprehensively activity by partner organisations – one LA suggested as part

⁴⁹ In relation to Principle 1 Practice 3; Principle 4 Practices 1, 2 and 4; and Principle 5 Practice 4 of the *Code of Practice*

⁵⁰ <https://www.gov.uk/guidance/homelessness-data-notes-and-definitions>

⁵¹ <https://www.gov.uk/government/publications/evaluating-the-extent-of-rough-sleeping--2>

of this Assessment that DCLG might consider collecting data separately from such organisations. DCLG does not quantify the likely impact of this under-reporting on the final statistics.

- 3.13 In *Rough Sleeping*, DCLG explains clearly that LAs decide whether to carry out a count or to produce an estimate based upon their judgement of ‘whether the local rough sleeping problem justifies counting’. In 2014, approximately 85 per cent of LAs provided estimates, representing 71 per cent of the total number of people estimated as sleeping rough. 50 LAs (approximately 15 per cent) reported a count or estimate of zero for their area on the night of the count. DCLG encourages LAs to gain intelligence from local agencies such as outreach workers, the police, and the voluntary sector and flags the LAs where that did not happen – less than 1 per cent of LAs in 2014. Homeless Link independently verifies all of the counts and estimates and DCLG told us that it then checks for any anomalous values and any large changes in the counts year-on-year – however, it said that it does not check for, or follow up with, LAs that continuously report a zero count.
- 3.14 Most of the users that we spoke with about these statistics questioned the accuracy of the Rough Sleeping Count. *Rough Sleeping* includes the following judgement about the quality of the statistics: ‘Although accurately counting or estimating the number of rough sleepers within the area of an LA is inherently difficult, the series is now regarded as well-established, with a consistent run of figures over five years, and with their robustness enhanced by Homeless Link being involved in verifying local counts and validating local estimates’. However, DCLG does not explain the ‘inherent difficulties’ for users or describe the potential sources of error and bias in the statistics. During the course of this Assessment, LAs and users described to us a range of methods for conducting the counts and compiling the estimates and explained some of the challenges that they face – most acknowledged that the recorded counts are likely to be underestimates. DCLG does not discuss this possibility in the statistical report or seek to quantify any uncertainty around the estimates. We consider that DCLG needs to better explain for users the assurance arrangements for these statistics, including how LAs and Homeless Link verify the estimates and counts, and evidence its judgement of the quality of the statistics. It is particularly important for DCLG statisticians to demonstrate this understanding since they do not have any direct involvement with the data collection arrangements. We also consider that while the Rough Sleeping Count is technically a survey of LAs and participation is voluntary, LAs draw on a range of administrative data sources to inform their estimates and counts, and so accordingly HSCIC should consider the areas of practice in the *Administrative Data Quality Assurance Toolkit*⁵².
- 3.15 *Rough Sleeping* also includes statistics about the characteristics of people sleeping rough in London using data from the CHAIN database maintained by Broadway, a London-based homeless charity. DCLG provides some information about how these statistics are collected and provides a helpful link to the full published CHAIN report⁵³. The statistics from CHAIN differ markedly from those produced by DCLG. DCLG explains that the reason that the number

⁵² <http://www.statisticsauthority.gov.uk/assessment/monitoring/administrative-data-and-official-statistics/index.html>

⁵³ <http://www.broadwaylondon.org/CHAIN/Reports/StreettoHomeReports.html>

of rough sleepers in London recorded by CHAIN are different from those presented in *Rough Sleeping* in that the DCLG count (543 in Autumn 2013) represents a snapshot whereas CHAIN records all individuals who were seen sleeping rough on the streets of London on at least one night during the entire year (6,508 in the year to end-March 2014). DCLG does not indicate if any analysis has been carried out to confirm that this is the only reason for the differences. We consider that this might be a helpful avenue to pursue as part of its assurance of the Rough Sleeping Count. DCLG does not include CHAIN in its *Statement of Administrative Sources*⁵⁴. As part of the designation as National Statistics, DCLG should:

- a) Publish information about the strengths and limitations of the Homelessness and Rough Sleeping statistics, including quantifying any potential sources of error and bias, and any uncertainty around the estimates
- b) Publish information about its quality assurance arrangements for the Homelessness and Rough Sleeping statistics that demonstrates a good understanding of the different collection arrangements and their impact on the quality of the statistics. Taking into consideration the *Authority's Data Quality Assurance Toolkit*, detail its judgement about the quality of the statistics, and the rationale for this judgement
- c) Include CHAIN in its *Statement of Administrative Sources* and explain for users the strengths and limitations of this administrative data source alongside the statistics⁵⁵

(Requirement 5).

In meeting this Requirement, we suggest that the DCLG team producing the Homelessness, Prevention and Relief statistics talks to its colleagues producing the English Indices of Deprivation about how they have evolved their assurance arrangements. The Director General for Regulation wrote to the DCLG Head of Profession for Statistics on 29 September 2015 saying that 'the range of activities undertaken to investigate the quality of the administrative data in the light of the Authority's guidance, *Quality Assurance of Administrative Data*, are commendable'⁵⁶.

Commentary and accessibility

3.16 DCLG presents three well-structured statistical supports in respect of *Statutory Homelessness, Prevention and Relief* and *Rough Sleeping*, with clear key messages and commentary supported by visual aids including summary, tables and charts, and maps. DCLG provides some helpful information about related legislation that helps to explain the concepts and terminology, and to provide some context for users. DCLG also draws on some other sources of statistics to provide context – for example: *Statutory Homelessness* presents information about the number of households living in the private rented sector from the

⁵⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/197885/SAS__Final_dr_aft_for_publication__with_cover__2_.pdf

⁵⁵ In relation to Principle 4 Practice 3 and Protocol 3 Principle 5 of the Code of Practice

⁵⁶ <http://www.statisticsauthority.gov.uk/assessment/assessment/assessment-reports/confirmation-of-designation-letters/letter-of-confirmation-as-national-statistics---assessment-report-303.pdf>

English Housing Survey to contextualise the reported reasons for households leaving their last settled home; and this report has already discussed that Rough Sleeping presents information about certain characteristics of people sleeping rough in London from CHAIN. DCLG does not explain the rationale for the choice of which aspects of the data to present from the published CHAIN report but told us that it reviews annually what information it might helpfully present depending on what is topical. The statistical reports all present relevant rates per thousand of the population for England and at LA level.

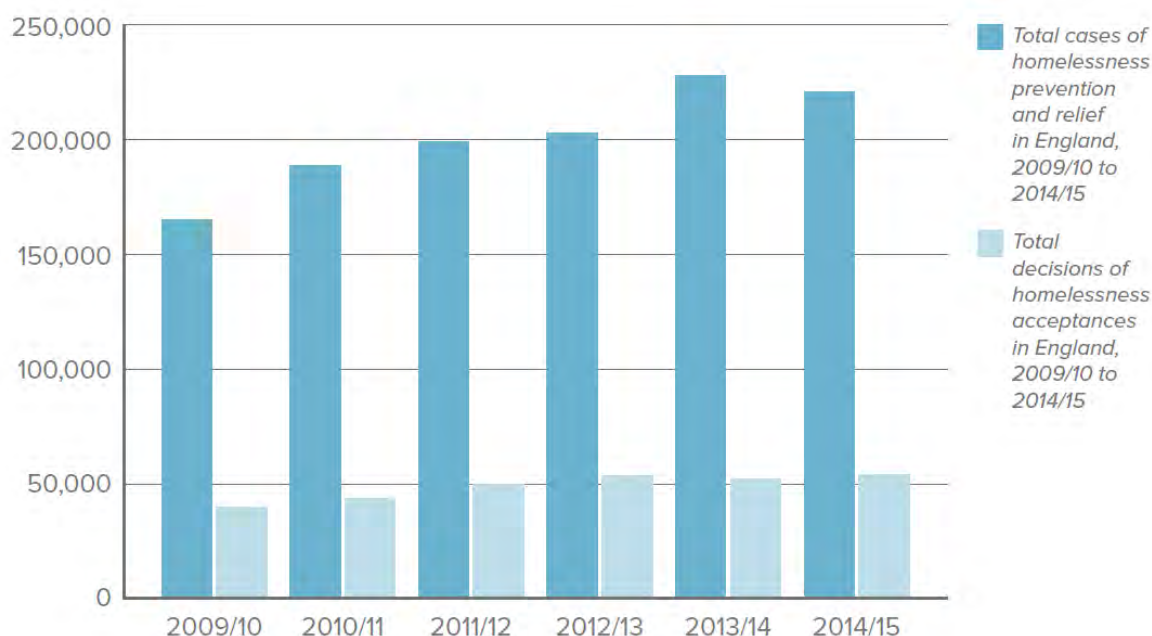
- 3.17 However, while DCLG includes links to other related DCLG statistics in each report, the findings for these are not drawn out to highlight their relevance to the main messages in the report. Links to related statistics produced by the devolved administrations are included with some explanation of the different policy backgrounds but only *Statutory Homelessness* discusses the comparability of the statistics from the other countries with those produced for England and DCLG does not present any related analysis. The statistical reports do not contain any links to published research other than CHAIN to help better explain the full homelessness picture.
- 3.18 We consider that while DCLG publishes a brief descriptive narrative in each of the three statistical reports that it produces on Homelessness and Rough Sleeping it needs to do more to add value by providing insight into the phenomena and what can be inferred from the statistics, including integrating different data sources to provide a more complete picture and to explore possible relationships between changes in patterns and trends of Homelessness and Rough Sleeping and broader changes in the economy and society. The publication arrangements for *Prevention and Relief* described in paragraph 3.3 of this report are a significant hindrance to presenting a coherent narrative around statutory homelessness and prevention and relief activities. For example, *Statutory Homelessness* says ‘in general the relationship between statutory homelessness activity and prevention and relief activity is fairly weak’ but it does not present any statistical analysis in support of this statement.
- 3.19 Users told us that they consider the lack of a coherent and transparent narrative a major limitation of the statistics, for example, when trying to get a sense of the supply and demand for homelessness services. Some commentators have sought to combine the statutory homelessness acceptances with the number of homelessness prevention and relief cases, as illustrated by Figure 4, combined with their own surveys and research, to help to provide an overall picture of homelessness in England. Writing to the Secretary of State for Work and Pensions in March 2015⁵⁷, in respect of points raised about DCLG’s Homelessness and Rough Sleeping Statistics by *The Homelessness Monitor: England 2015*⁵⁸ published by Crisis and the Joseph Rowntree Foundation, the Chair of the Authority said: ‘The Statistics Authority encourages those producing official statistics to consider the potentially different perspectives of a wide range of users and to seek out other sources of relevant information about their statistics. Such activity can help to corroborate

⁵⁷ <http://www.statisticsauthority.gov.uk/reports---correspondence/correspondence/letter-from-sir-andrew-dilnot-to-rt-hon-iain-duncan-smith-mp-060315.pdf>

⁵⁸ See footnote 21

the statistics, can enhance the coherence of statistical reporting, and can serve as a stimulus to check whether the existing statistics meet users' needs'.

Figure 4: Statutory Homelessness and Homelessness Prevention and Relief in England from 2009/10 to 2014/15



Source: Homeless Link⁵⁹

- 3.20 While DCLG presents a range of information at LA level, users told us that they are missing a regional perspective from the statistics. DCLG explains in its statistical reports that it does not 'include any totals for former government regions except London following the consultation on the publication of regional statistics in 2012. Further details are given in the Written Ministerial Statement of 18 December 2012'⁶⁰. DCLG told us that its Head of Profession for Statistics is currently considering this strategy with a view to possibly including a greater regional dimension as part of its statistics going forward. The Authority welcomes this news. We also think that DCLG could deliver some early benefits for users by extending its application of harmonised geographical coding⁶¹ to the data tables so that users can easily analyse the information by region as well as by LA.
- 3.21 As part of the designation as National Statistics, DCLG should improve the value of the Homelessness and Rough Sleeping statistics and aid user interpretation by:

⁵⁹ <http://www.homeless.org.uk/sites/default/files/site-attachments/20150715.How%20many%20people%20in%20England%20are%20at%20risk%20of%20becoming%20homeless.pdf>

⁶⁰ <https://www.gov.uk/government/speeches/statistics-for-local-enterprise-partnerships-and-upper-tier-local-authorities>

⁶¹ As set out in the Government Statistical Service Geography Policy: <https://gss.civilservice.gov.uk/wp-content/uploads/2015/03/GSS-Geography-Policy-is-now-available1.pdf>

- a) Including an enhanced contextual narrative and framework for Homelessness and Rough sleeping statistics, and drawing on other data sources as appropriate to provide a more complete picture of Homelessness and Rough Sleeping in England and to explore possible relationships between changes in patterns and trends of Homelessness and Rough Sleeping with broader changes in the economy and society
- b) Presenting a regional perspective, including adding harmonised region codes to LA datasets to allow users to easily re-use the data for regional analysis
- c) Presenting more information about the comparability of the statistics for England with: those presented for the other countries of the UK; and those presented by other organisations such as high profile charities⁶²

(Requirement 6).

For *Statutory Homelessness and Prevention and Relief*, DCLG should consider this Requirement in connection with Requirement 2 of this report.

In meeting this Requirement, we suggest that DCLG considers the Authority's *Standards for Statistical Reports*⁶³. While this is not part of the *Code*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*.

3.22 DCLG publishes a range of data tables in Excel format as part of the Homelessness and Rough Sleeping statistics. For *Rough Sleeping*, it publishes a single Excel table⁶⁴ directly alongside the statistical report that presents a count or estimate for each LA for the latest year and some basic metadata to help users interpret the table, including a link to the guidance notes issued to the LAs collecting the data. DCLG does not present any time series. For both *Statutory Homelessness and Prevention and Relief*, DCLG publishes a series of data tables in Excel format within single workbooks – a clearly labelled contents page sets out the variables, geography and length of time series included in each table⁶⁵. DCLG also presents tables in Excel format with detailed breakdowns by LA. Some users said that the data tables are difficult to find on GOV.UK – DCLG clearly signposts the tables from the 'Accompanying tables' section within the reports but the link to the tables from the html pages could be more prominently displayed.

3.23 Users also told us that they would like to have the facility to create their own cross-tabulations of the data – one user mentioned the Department for Work and Pension's StatXplore⁶⁶ as a good model. DCLG told us that it is reviewing across its portfolio of official statistics what more data it can make available in open formats to support re-use. *Statutory Homelessness, April to June 2015* provides a link to DCLG's dedicated Open Data site where it makes some of its Statutory Homelessness data available⁶⁷. The Authority welcomes this continuing development. As part of the designation as National Statistics, DCLG should review, and update where necessary, the formats in which it

⁶² In relation to Principle 4, Practice 6 and Principle 8, Practices 1, 2 and 3 of the *Code of Practice*

⁶³ <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-reports.html>

⁶⁴ <https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2014>

⁶⁵ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

⁶⁶ <https://stat-xplore.dwp.gov.uk/>

⁶⁷ <http://opendatacommunities.org/def/concept/folders/themes/homelessness>

publishes the data associated with Homelessness and Rough Sleeping statistics. As part of this Requirement it should:

- a) Present time series in the data tables for *Rough Sleeping*
- b) Clearly signpost the links to the Excel data tables on the statistical reports html pages to ensure that they are accessible to users⁶⁸

(Requirement 7).

Confidentiality, equality of access and revisions

3.24 LAs submit data to DCLG for *Statutory Homelessness and Prevention and Relief* via an on-line reporting system. LAs told us that, in addition to their own data, they are able to view each others' returns via this system before the official statistics are published. DCLG confirmed this arrangement and said that while LAs do receive a warning message advising that all the data are subject to change before final publication, it is reviewing these data access arrangements. While we support the sharing of comparable data between LAs for planning and benchmarking purposes, we consider that it is important that DCLG considers these data sharing arrangements within the context of the *Code* and in particular with respect to: equality of access; protecting confidentiality; promoting comparability and preventing misuse. As part of the designation as National Statistics, DCLG should confirm the arrangements for data sharing with LAs and demonstrate that these arrangements are consistent with the *Code*⁶⁹ (Requirement 8).

3.25 DCLG has published a Revisions Policy⁷⁰ and presents a brief summary of this policy in *Statutory Homelessness and Prevention and Relief*. The statistical reports clearly state the periods for which the data can be revised and labels revised values in the data tables⁷¹. However, it does not discuss or quantify the scale of the revisions. *Rough Sleeping* clearly states that the statistics are not subject to scheduled revisions. As part of the designation as National Statistics, DCLG should publish information about the nature and extent of any revisions to the Statutory Homelessness and Prevention and Relief statistics at the same time that they are released⁷² (Requirement 9).

⁶⁸ In relation to Principle 8, Practice 6 of the *Code of Practice*

⁶⁹ In relation to Principle 2, Practice 3; Principle 4 Practice 6; Principle 5 Practice 4; and Principle 8 Practice 3 of the *Code of Practice*

⁷⁰ <https://www.gov.uk/government/publications/statistical-notice-dclg-revisions-policy>

⁷¹ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness>

⁷² In relation to Principle 2, Practice 6 of the *Code of Practice*

Annex 1: Summary of assessment process

A1.1 This assessment was conducted from June to October 2015.

A1.2 The Assessment team – Johan Mulligan, Donna Livesey and Oliver Tatum – agreed the scope of and timetable for this assessment with representatives of the DCLG in June. The Written Evidence for Assessment was provided on 20 August. The Assessment team subsequently met DCLG during September to review compliance with the *Code of Practice*, taking account of the written evidence provided and other relevant sources of evidence.

Summary of users contacted, and issues raised

A1.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare Assessment reports.

A1.4 The Assessment Team spoke directly with 19 users. In addition, the Assessment team received 4 email responses from the user consultation. The respondents were grouped as follows:

Local government	7
Charities	6
Academics	3
Central government	2
Devolved government	2
Commercial	1
ONS	1
International	1

Key documents

- Written Evidence for Assessment documents completed by DCLG – organisational evidence and output evidence
- [Statutory Homelessness in England, April to June 2015](#)
- [Homelessness Prevention and Relief: England 2014 to 2015](#)
- [Rough Sleeping in England: Autumn 2014](#)
- Minutes of Assessment team meetings with users and data suppliers, and email responses

