



HOMELESS LINK'S RESPONSE TO PROPOSED CHANGES TO GUIDANCE ON EVALUATING THE EXTENT OF ROUGH SLEEPING - AUGUST 2010

Homeless Link is the national umbrella organisation for frontline homelessness charities in England. Currently we have more than 470 member organisations. Our members include hostels, day centres, outreach and resettlement agencies, housing advice centres, youth projects, health projects, welfare rights groups, regional homelessness networks, refuges, drug and alcohol services and faith-run voluntary services. As the collaborative hub for information and debate on homelessness, we seek to improve services for homeless people and to advocate for policy change. Through this work, we aim to end homelessness in England.

1. INTRODUCTION AND SUMMARY

Homeless Link welcomes the government's consultation on the guidance for evaluating the extent of rough sleeping. We value the government's aim to improve the methodology for estimating the numbers and extending the definition used in street counts. We also appreciate further involvement of the voluntary sector, and Homeless Link specifically, in the guidance on estimation and the delivery of future street counts. We look forward to working with the government to make ongoing improvements to the process.

This response outlines our views on the proposals, based on feedback from our member agencies. Given that the proposals contain elements specifically relating to Homeless Link (taking on responsibility for independent verifiers, and the development of a toolkit offering guidance on street counts and estimates), we look forward to continuing our discussions with Communities and Local Government on how these may be delivered.

2. RESPONSE

We respond on the six key elements of the proposal below:

2.1 Street counts are no longer required, but remain an option for local authorities

2.2 All local authorities are required to submit a rough sleepers estimate in lieu of a count

Street counts are one of a number of useful tools in assessing levels of rough sleeping. We agree that they cannot hope to identify the full number of rough sleepers in England per year. Indeed, we have developed tools and resources to support frontline agencies and local authorities to find ways to carry out accurate audits, such as our PrOMPTⁱ and MOPPⁱⁱ tools. However, the key utility of street counts is to provide a snapshot enabling trends to be identified. Historically, counts have proved particularly helpful in identifying changes in rough sleeping (e.g. an increase in a particular area) and wider developments (such as the sharp decline in rough sleeping numbers between 1999-2001). Street counts also assist local

authorities to assess the usefulness and viability of their rough sleeping strategies and evaluating levels of local need. **However, it is vital that counts are not undertaken in isolation, so that local authorities can effectively track and respond to ongoing levels of need.** A range of different approaches can be used to supplement the street counts and we would like to see these promoted by government to local areas. Examples include:

- Street needs audits involving assessing need, identifying lead agencies and determining if active action plans are in place.
- Local intelligence models, supplementing the street count with information collected from agencies who might observe a person sleeping rough during their routine duties, e.g. police, fire and rescue service, street cleaners, CCTV operators, etc.
- Community Auditors, involving recruitment of auditors from the community who monitor and report on levels of street activity in their area, e.g. London Borough of Camden.
- Using existing local data, e.g. the CHAIN database for London.

We welcome that all local authorities will be required to provide at least an estimate of rough sleepers. The changes should offer a more accurate snapshot of rough sleeping across England. The recent figure of 1,247 rough sleepers for England based on estimates and street countsⁱⁱⁱ was in sharp contrast to the 440 figure derived using the street counts system alone. Indeed, the 12 local authorities with the highest estimated numbers of rough sleepers gave estimates of over 10, suggesting that they should have carried out street counts previously. The use of estimates may also be more appropriate to ensure areas with low numbers of rough sleepers (such as some rural areas) are included in the overall picture.

For these estimates to be effective, they should be based on the systematised collection of as much evidence as possible from all relevant local partners. Undertaking an estimate is the first stage of a larger monitoring and activity process, which should often include a street count. Homeless Link will be submitting draft guidance on estimates and street counts to Communities and Local Government that details how this would work in practice. In addition to good practice examples of local authorities' street counts, there are also more sophisticated estimate models. For example, Harrow Council have included support needs, benefit status and other key information in locally estimating rough sleeper numbers. Also, Newark and Sherwood District Council in Nottinghamshire used the local intelligence model in estimating the number of individuals sleeping rough. Also the CHAIN database in London has shown the benefits for services and commissioners that can come from collecting more information than simply numbers of rough sleepers.

We also welcome all attempts to improve the accuracy of street counts. However, the view from the homelessness sector is mixed on making street counts optional. While street counts have been subject to criticism in the past^v, many organisations view them as useful for the reasons outlined above. A number of organisations feel that street counts should be compulsory, and failing that at least be strongly encouraged, to aid comparisons nationally and between areas. Many organisations will continue to undertake street counts in partnerships with local authorities, as well as regular outreach and review of the numbers and needs in their community.

While establishing and improving on a consistent measure is important, **our key focus must be on how we can eliminate rough sleeping overall.** There has been much progress made towards the goal of ending rough sleeping by 2012 and we hope the Government will remain

focused on achieving this aim. An improved street count will help make the 2012 goal a reality, but more important is the commitment and will from central government and local authorities to make this happen. An example of how this can be achieved has been provided by the Mayor of London who has led the way by committing to ending rough sleeping in his statutory London Housing Strategy. The multi-agency London Delivery Board has been working for the past 18 months to make this vision a reality.

2.3 Expanded definition to potentially include more rough sleepers in counts

We welcome the increased flexibility and extension of the definition of rough sleeper. We feel that this will contribute to more accurate street counts.

There are additional elements that will need to be addressed in the revised guidance for the street counts and estimates, if not in this year's count (because of the time constraints), then in the 2011 count. A couple of key examples are highlighted:

i) Underrepresentation of particular groups

There has been historic concern that a number of groups risk being underrepresented in rough sleeping figures.^v For example, women are often "hidden homeless" and undercounted in street counts. Women may be very vulnerable when sleeping rough (from assault and exploitation)^{vi}, and as a result tend to use more secluded or (perceived) secure locations to sleep when living on the streets. Likewise, women may be more likely to sleep in the day to avoid the greater perceived risks of sleeping during the night. Street counters, for understandable safety reasons, are often not permitted to go into 'risky' areas (e.g. some dark alleyways or unlocked doorways), but these are some of the places those most vulnerable are likely to have secreted themselves. The involvement of police in street counts will be crucial in areas where this may be an issue.

ii) Underrepresentation of rough sleepers on public transport

Street counts are likely to miss rough sleepers using public transport as a place to sleep. Particularly in the winter when many rough sleeper counts are undertaken, and in metropolitan areas, there is likely to be a significant proportion of rough sleepers taking refuge on warmer buses, trains, trams or tubes.^{vii}

The work on counting rough sleepers must also be effectively coordinated with other activities by Communities and Local Government and the homelessness sector to develop a clear picture of the numbers of all homeless people, not just rough sleepers. Other homeless groups such as 'sofa surfers' (who may also be at risk of rough sleeping) should be included in local authorities' homeless strategies. We continue our discussions with Communities and Local Government, as well as the Office of National Statistics to ensure information is effectively collected and collated with other widespread monitoring, such as the 2011 census.

2.4 More coordination of street counts between areas, to avoid duplication or loss of individual rough sleepers.

We broadly welcome the changes proposed. We feel that this will contribute to a more accurate picture of rough sleeper numbers on the nights of the counts. Last November, a

significant number of London boroughs held a successful, coordinated street count, which was judged to successfully increase accuracy. Our forthcoming guidance will provide direction on these elements.

However, there are concerns that this time period is too broad and will make comparisons between areas difficult. For instance, September can experience warmer weather and potentially more people will sleep rough than towards the end of October and into November. Consequently, those areas that choose to undertake a count/provide an estimate in September may have a higher figure compared to those areas that undertake a count in November when the temperature is significantly colder. It is suggested that counts do not take place in September to negate these potential inconsistencies. To this end, some agencies feel that there should continue to be two distinct periods during which counts can take place, i.e. 1st October to 30 November (autumn count) and/or 1 March to 31 May (spring count). These would take account of seasonal variations in order to map issues such as migration to coastal or rural areas (such as during summer months).

2.5 Shift to 2am start time for street counts

We welcome the recommendation to change to 2am starts, as a means of increasing the flexibility of counts. This should enable local groups to determine the most appropriate way of counting in their specific location bearing in mind their specific patterns and cultures of rough sleeping. Indeed, the earlier start time of 12am has made street counts more difficult in central metropolitan areas. For example, the outflow of individuals from pubs and clubs may well lead to many rough sleepers avoiding these areas at this time. For later counts, provisions for counters safety may need to be reconsidered, both for counters arriving at counts, and returning home after a count is undertaken. However, it is worth noting that some Outreach Providers have expressed concern that this later start may make it harder to recruit volunteers for counts.

2.6 Homeless link to be responsible for independent verifiers

Homeless Link welcomes this responsibility. With our staff across the country and our members throughout England, we are well-placed to deliver the toolkit and overseeing of the verification process. Likewise, the placement of the independent verifiers service with a respected 3rd sector organisation may add credibility to their work.

However, in order to ensure that independent verification is both effective and credible in future counts, our members raised concerns about there being sufficient resources and Government support to ensure that local authorities work effectively with Homeless Link. We look forward to continuing our ongoing discussions with Communities and Local Government on how this role would be sustainable.

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- ⁱ PrOMPT is the Prevention Opportunities Mapping and Planning Toolkit, developed as part of the 'No One Left Out' strategy aimed to eliminate rough sleeping in England by 2012. PrOMPT guides local authorities and partners through four main stages: partnership building, audit and analysis, action planning, review. More information on PrOMPT is available at: <http://www.homeless.org.uk/prompt>
- ⁱⁱ MOPP is the Move On Plans Protocol, designed to help local authorities and service providers address local factors preventing effective move-on. The protocol is based around local partnership; a move-on audit; the development of a move-on action plan; and regular analysis of progress and results. More information is available at: <http://www.homeless.org.uk/mopp>
- ⁱⁱⁱ Communities and Local Government (2010) *Rough Sleeping England - Total Street Count and Estimates 2010*. Available At: <http://www.communities.gov.uk/publications/corporate/statistics/roughsleepingcount2010>
- ^{iv} See Gaines, S. (2007) *Government accused of underestimating homelessness* problem, Guardian newspaper online. Available at: <http://www.guardian.co.uk/society/2008/sep/15/rough.sleepers>; Also Shapps, G. (2007) *Roughly Sleeping: How a black hole in the street count leads to a systematic underestimate of the number of people sleeping on the streets*. Available at www.shapps.com/reports.
- ^v Communities and Local Government (2008) *Rough Sleeping 10 Years On: From the streets to independent living and opportunity - Executive Summary*, p.4. Available at: <http://www.communities.gov.uk/publications/housing/roughsleepingdiscussionresponse>
- ^{vi} Jones, A. (1999) *Out of Sight, Out of Mind: The Experiences of Homeless Women* produced by Centre for Housing Policy (University of York) and Crisis. Available at: <http://www.york.ac.uk/inst/chp/publications/women.htm>.
- ^{vii} Twinch, E. (2010) 'Charity targets bendy bus rough sleepers', *Inside Housing*. Available at: <http://www.insidehousing.co.uk/charity-targets-bendy-bus-rough-sleepers/6508658.article>