

HOMELESS LINK RESPONSE TO TRANSPARENCY CODE CONSULTATION

Homeless Link is the national membership organisation for agencies working with people who are homeless across England. We have more than 490 members, whose services range from local authority housing services, day centres, outreach services, residential care homes, hostels, supported housing, floating support through to employment, training and education.

Data and Homelessness

Accurate and transparent data is essential to providing effective services to homeless clients. We welcome the opportunity to engage with the proposals at this stage of the reform. We endorse the broad principles of the document, particularly in terms the emphasis the consultation places on open access to data sets that can facilitate effective commissioning and elucidate trends and outcomes for service users.

Although broadly we welcome this move towards increased data transparency, there are a number of provisions that need to be embedded to enable local communities to make best use of any published data. Furthermore we believe that some data is of such value that it should be collected on a national basis. From the perspective of a homelessness service provider it is crucial to maintain and publish homelessness data for the following reasons:

- To fully understand the extent and nature of the homelessness population;
- To disseminate as widely as possible evidence on what works and what does not in addressing the needs of homeless people;
- To minimise the duplication of services and therefore focus activity on areas where there remain gaps in provision; and
- To improve the overall quality of care for the homeless research.

National Data

With the announcement that Supporting People (SP) data will no longer be collected from next year, this removes a significant national data source covering non statutory homeless people. The only non-statutory national homelessness data that the local authorities will collect is the figures for the annual rough sleeper counts. Although these counts are valuable they do not provide an accurate picture of flow in and out of homelessness and do not collect any information regarding the effectiveness of different types of intervention.

The detailed information collected through the SP programme has been invaluable to establishing the social and financial value of homelessness service providers. Homeless Link is concerned that the demand-led structure of the proposed Code, its minimal requirements, the lack of a clear chain of accountability and the fact that there is no requirement to standardise data collection across Local Authority (LA) areas does very little to establish a clear picture of non-statutory homelessness at any scale.

Homeless Link would like to see data collected concerning the health, employment, criminal justice and housing outcomes of any client accessing homelessness services. Standardised data collection across these outcomes will enable:

- National government to see the outcomes and impacts of legislative change and to draft evidence based policy;
- Local authorities to make informed and effective commissioning decisions;
- Social care providers to compare and contrast the cost effectiveness of homelessness interventions across LA areas and share best practice; and
- The general public to understand the value of LA spending on homelessness service providers thereby promoting informed civic engagement.

“The Government believes it is essential local people know how much funding is directed towards the voluntary and community groups and wants to increase local accountability on such spending decisions and the transfer of services to this sector. Are there additional, existing data sets that should be specified to increase transparency in this area?”

While Homeless Link believes that the collection of data is a very important step there needs to be an acknowledgement that abstract lists of transaction costs such as those published since January 2011 are only useful if the reader has knowledge of the context and social value of the transaction. Simply stating that £100 from the Adult Care budget was paid to a service provider is not transparent. In order to promote civic engagement the general public needs to understand the context and value of the transaction.

Although publication of invitations to tender and contracts will help generate a context they do little to illustrate the savings made to the wider public purse as a result of a specific spend and therefore put the spend in its accurate context. To take an example from the homelessness sector, just publishing the monthly spend on one floating support contract does not enable the reader to understand that money spent on the floating support contract potentially saves money from the law enforcement budget or the local housing benefit bill.

In order address this issue the minimum requirement set out in the Code should be supplemented by a requirement to publish outcome reports, and publications of expenditure over £500 should be clearly linked through to the contract relative to each spend and include links to any other pertinent external sources of context. In this way the published data will become meaningful to local communities and facilitate the aims of civic engagement, efficiency and improved outcomes.

With regards to existing data sets, homelessness information collected via the rough sleeper counts, the P1E form and applications for assistance made to local authorities are all invaluable data sources that Homeless Link would like to see published and maintained. The SP Local Systems contracts data is also extremely useful in setting a baseline for SP spend; we understand this is also to be discontinued and suggest this decision could be reconsidered. We would also like local authorities to publish data regarding the type of vulnerability that lead to a homeless acceptance.

“Does the proposed code sufficiently support the publication and reuse of public data?”

In addition to a requirement that data is suitably contextualised through the addition of outcome reports and external linking Homeless Link is also eager for data to be collected more consistently.

A more standardised methodology will facilitate comparison between LA areas and enable local stakeholders to analyse both the local and national picture. Given the diverse range and scale of organisations subject to the Code, standardisation is essential for enabling the general public to compare level and social value of spending and to benchmark spending against similar spends in other LA areas.

This public data can only be used to highlight inefficiency and open new markets for local business, the voluntary and community sectors and social enterprises if data can be more easily compared and examined across LA areas. Homeless Link recommends that at a bare minimum data regarding spending on issues such as homelessness is collected using a standardised technique and set of fields.

“Does the proposed Code and the principles contained within it help to create the conditions whereby local people will be able to hold local authorities to account?”

As the aim of these proposals is to place more power in the hands of the people and to move towards genuinely transparent governance then publication of raw data alone is unsuitable. Raw data will only really be of use to trained data analysts. The general public is likely to find raw data obscures LA spending rather than increasing transparency. In addition raw data may be easily misunderstood or misrepresented.

We believe that in order to maximize the potential of the publications, raw data should be released in conjunction with reports and guidance documents that demonstrate which accurate conclusions can be drawn from a particular data set. In this way a LA can empower both large and small organisations and the general public. As the proposals stand there is a disproportionate weighting placed on access to information while the tools that enable analysis have been neglected. There needs to be an acknowledgement that some individuals and organisations are better equipped to use raw data. The inclusion of outcome reports derived from standardised data and guidance around how to use raw data should also maximise the number of people who can participate in local democracy on an equal footing.

Finally while Homeless Link welcomes the requirement for LAs to publish data we are concerned that the consultation does not stipulate any clear indication of how this requirement will be enforced or any description of the chain of accountability. We are concerned that although a demand led structure to establishing what data sets are released has potential, without a clear system of accountability or enforcement demand could go unmet.

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March 2011