



HOMELESS LINK

RESPONSE TO DRAFT STATISTICS PLAN FOR 2011/12 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 data is essential to providing effective services to homeless clients. We therefore welcome the opportunity to engage with the proposals at this stage of the reform. We understand the need for cost savings and are pleased to acknowledge the retention of several key homelessness data sets. These data sets facilitate effective commissioning and elucidate trends and outcomes for individuals experiencing homelessness.

However, analyzing the present consultation in conjunction with the ethos underpinning changes to the 'Single Data List' we are concerned at the volume of data collection activities that are being reformed. We are eager that any efforts to reduce data production at a central or local level are managed carefully and wherever an obligation to collect a certain set is abandoned the potential impact on and unintended consequences for excluded groups are closely scrutinized to ensure the weakening of the evidence base does not exacerbate exclusion. The needs of socially excluded groups such as the homeless should be a primary consideration when discontinuing a data collection activity.

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 enable dissemination of 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.

NATIONAL DATA

Now that Supporting People (SP) data will no longer be collected, this removes a significant national data source covering non statutory homeless people. The only non-statutory national homelessness data set remaining is the figures generated by 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 and for maximising the efficacy of homelessness interventions. Homeless Link is concerned that the proposed changes to the Statistics Plan does very little to fill the vacuum left by discontinuing the SP data collection activity and does not enable stakeholders 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 spending on homelessness thereby promoting informed civic engagement.

Although we acknowledge the need to reduce spending we believe that ill-considered cessation of data collection activities could be a false economy, effective interventions with all people experiencing homelessness are predicated on a comprehensive evidence base. Furthermore effective interventions are essential for achieving value for money, keeping costs down and to “support the most vulnerable and disadvantaged in our communities”¹. Specific comment on the changes proposed to individual data sets can be found below.

ENGLISH HOUSING SURVEY (EHS) HOUSEHOLD REPORT

The English Housing Survey is an essential data set for organisations working with homeless people. For the homelessness sector this survey provides essential information on overcrowding, quality of accommodation, mortgage difficulties and rent levels in the private and social sectors.

OVERCROWDING: is a significant problem in England with 1 million children living in overcrowded households. These overcrowded living conditions have a detrimental effect on life chances. Furthermore overcrowding is a strong predictor of homelessness as children are prematurely pushed out of the family home into temporary and insecure accommodation. At present the sample of overcrowded households is not of a suitable scale to generate yearly overcrowding figures this limits the homeless sector’s ability to accurately monitor overcrowding. This inability has a detrimental effect on prevention efforts and subsequently supports a flow into homelessness with its detrimental effect on the individual and increased costs for local and national government.

Homeless Link is concerned at the plans to reduce the detail of the published data. This concern is compounded by the proposed move to reduce the sample size for the EHS indicated in DCLG’s² recent cost review. As noted above the present sample size only allows meaningful overcrowding statistics to be published for a three yearly aggregate of the overcrowded subset, the cumulative effect of the cost review and

¹ DCLG (2010) “DCLG Business Plan 2011-2015”
<http://www.communities.gov.uk/documents/corporate/pdf/1762476.pdf>

² DCLG (2010) “Proposals arising from a cost review of the English Housing Survey (EHS) – Consultation”
<http://www.communities.gov.uk/documents/housing/pdf/1686260.pdf>

this consultation's proposal to reduce the detail may have a pronounced effect on our ability to understand and address overcrowding. In order to support prevention activity we are eager to see the information on overcrowding supplemented and the sample enhanced to allow publication of yearly overcrowding statistics. This will allow homelessness service providers to more closely monitor emerging trends and react more quickly. This will enhance the effectiveness of prevention work; facilitate accurate need analysis and ultimately reducing a flow into homelessness.

QUALITY OF ACCOMMODATION: the information collected concerning the quality of accommodation and prevalence of damp enables the sector to monitor the suitability of rehousing offers made to homeless people. This is of considerable importance now that Local Authorities have been permitted, by the Localism Bill, to exercise their duty to homeless people through a rehousing offer in the private rented sector (PRS). Rather than a reduction of detail we would like to see the detail enhanced so that the Survey can act as the foundation for a landlord accreditation scheme. Such a scheme could be an important step toward ensuring housing opportunities are suitable for the needs of excluded groups. Ensuring suitable housing is an effective method for cultivating a sustainable tenancy and therefore maximising an individual's chances of social reintegration.

MORTGAGE DIFFICULTIES: the information collected on mortgage difficulties enables the sector to monitor demand for advice and prevention services for homelessness caused by repossession. Maintaining this data set in its current form will allow homelessness organisations to continue to prevent households becoming homeless in this way and permits accurate needs analysis for homelessness service providers and LA Housing Need managers.

RENT LEVEL IN PRS AND SOCIAL HOUSING: publication of rent levels is very important for monitoring the effect of changes to housing benefit (HB) legislation. The introduction of HB caps and the limiting of HB claimants to PRS housing in the bottom 30th centile of the market may have a pronounced effect on homelessness especially in areas with high median rents. Collection of data concerning rent levels in the PRS will allow homelessness organisations to monitor whether rents fall within the new caps and to deduce the quality and therefore sustainability of accommodation available to claimants renting in the bottom 30th centile of the market. Retention of this data set will permit assessment of HB legislation and facilitate lobbying work if rents fail to correspond to the amount an individual is eligible to claim under the new system. Furthermore the information on average social housing rents allows us to monitor the impact of the shift to the 'Affordable Rent' system set out in the Localism Bill where social landlords are permitted to charge 80% of market rent to social tenants.

HOMELESSNESS PREVENTION AND RELIEF

We are very pleased that the Homelessness Prevention and Relief statistics are being retained. This data set is an important resource for establishing the efficacy of LA prevention activities. An accurate record of which prevention and relief activities work is essential for refining technique and improving outcomes.

Although these statistics are very important their accuracy could be improved by monitoring the outcomes of prevention activity at set intervals over a longer period of time. Homelessness is often a revolving door with people re-experiencing imminent homelessness sometimes years after their first risk period was addressed. We would like to see data collected regarding the outcome of an individual's homelessness prevention at six monthly periods up to the two year point. This move to a longitudinal

survey of prevention outcomes would help us establish which prevention activities elicit a sustainable housing outcome. In addition to providing a more complete picture of what works the continued contact necessitated by a longitudinal model would also mean that any crisis periods outside the current six month monitoring period could be addressed quickly. A shift to a longitudinal model would indicate an understanding that homelessness is a multi-factorial issue with numerous risk periods in an individual's, sometimes lengthy, period of social reintegration.

ROUGH SLEEPING STATISTICS

We are pleased to see that the Rough Sleeping Statistics will be retained in their current form. This data set is an important resource for homelessness services providers and local authorities. These figures provide the only remaining national indicator of single homelessness and as such their preservation is essential. The updated methodology for the counts is a significant improvement on previous years and allows central government to more accurately monitor the extent and nature of single homelessness in England. The count figures are also essential to enabling LAs and homelessness service providers to accurately assess local need and to develop evidence based strategies.

STATUTORY HOMELESSNESS STATISTICS

The Statutory Homelessness statistics are important to the homelessness sector for the following reasons:

- the details regarding volume and characteristics of applicants enable the voluntary sector to undertake strategic planning;
- they enable providers to develop services based on evidenced need; and
- through monitoring the number of refusals allow the sector to establish a notional figure that can be used as an indicator of single non-priority need homelessness in a given area.

Homeless Link is concerned over the proposed changes to this data set. If quarterly reports only include 'headline and volatile' data we would like the definition of volatile put through a full consultation process and to be regularly reviewed. Given the extent of legislative changes that have impacted on homeless people in the last 12 months the entire homeless population should be defined as volatile until these changes have been given a sufficient transition period. Defining 'volatile' as only those factors that have been subject to regular and significant fluctuation over the last 5 years would fail to acknowledge the impact of the new and impending legislative framework and limit ability to monitor and react to emerging trends. Given the current legislative transition and the general shortage of national homelessness data sets we urge you to continue publishing quarterly reports with either the same or greater levels of detail.

With regards to development of new statistics products we are very eager for the P1E form to be expanded slightly to collect the reason for homelessness and basic demographic information of those found not to be in priority need. This addition to the product would greatly improve homelessness providers' ability to respond to the needs of single homeless people in their area. Improving the evidence based in this way allows homelessness service providers to target their interventions to evidenced need, this has the potential to improve efficiency and consequently drive down costs.

Evidence is essential to crafting relevant interventions for people experiencing homelessness, as such we urge you to pay close attention to the complex needs of excluded groups before you curtail any data collection activities. Efficiencies can only be achieved through the development of the evidence base; ill-conceived cessation

of data collection activity may compromise the evidence base and lead to increase costs in the future.

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