



Rough Sleeping Estimates Toolkit 2020

A guide for Local Authorities

Let's end homelessness together

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Full toolkit available at:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Introduction

Since autumn 2010, all local authorities have been required to submit an annual snapshot figure to MHCLG to indicate the number of people sleeping rough in their area on a typical night between 1st October and 30th November. They can arrive at this snapshot by using one of three approaches:

1. **Count-based estimate** with a full physical count of visible rough sleeping
2. **Evidence-based estimate** meeting using evidence from different partner agencies, which may include people in hidden rough sleeping sites
3. **Evidence-based estimate, including a spotlight count** using evidence from different partner agencies. This includes a physical count of areas with visible rough sleeping alongside evidence for other locations (discussed during an estimate meeting), which may include people in hidden rough sleeping sites.

All of the above approaches record only those people seen, or thought to be, sleeping rough on a single 'typical' night. They do not include everyone in an area with a history of sleeping rough, or everyone sleeping rough in areas across the October-November period.

The annual rough sleeping snapshot allows local authorities to track progress, consider whether current measures are effective in tackling rough sleeping, and if new approaches are needed. MHCLG produces a statistical release based on the data each year.¹

Homeless Link's role is to:

- Publish a toolkit that supports local authorities to produce the most accurate snapshot using one of the three approaches
- Provide support to local authorities in planning and carrying out the data collection
- Verify each rough sleeping snapshot
- Provide training and support to verifiers
- Cross-check the data submitted by local authorities to MHCLG with the numbers Homeless Link has verified for each local authority (the single figure of people sleeping rough and demographic information)

Local authorities should appoint a lead person to oversee the process and liaise with Homeless Link's Counts & Estimates Project Manager for support and to arrange verification: verifiers@homelesslink.org.uk

COVID-19

The coronavirus (COVID-19) pandemic has affected the way in which we work and will also likely have an impact on the process for conducting annual rough sleeping snapshot estimates this year. Throughout this guidance there is specific advice about COVID-19 and how it may impact this year's process. Please note, this guidance draws on the latest government advice at the time of writing, but this advice may change and if so, any new advice will take precedence. The latest COVID-19 guidance is available [here](#). Please contact Homeless Link's Counts & Estimates Project Manager if you have any questions or need clarification on adjustments: verifiers@homelesslink.org.uk

Note that information will need to be adapted to your local context, especially where local lockdowns apply. Everyone should follow [general infection control principles](#) to help prevent the spread of the virus. Where possible, carry out the process online. Please read the Guides (pages 10-26) for more detailed adjustments.

¹ www.gov.uk/government/collections/homelessness-statistics#rough-sleeping

Why use snapshot estimates?

There is currently no ongoing national data collection for the total number of people sleeping rough in England throughout the year. Engagement by local authorities and their partners with people sleeping rough varies greatly between areas, depending on levels of rough sleeping and whether outreach or other services have been commissioned locally. In some areas, street outreach teams record all rough sleeping activity and can produce regular reports (e.g. CHAIN in London²), but this is not a national arrangement. People who sleep rough do not necessarily go to their local authority, or have already been turned away in the past, so may not be represented in statutory homelessness statistics.

This means that a dedicated systematic and consistent approach is needed in order to get comparable, real-time rough sleeping snapshot figures from every local authority in England. The approach used since 2010 is to collect national rough sleeping statistics using a snapshot approach where each local authority chooses one typical night and follows the same guidance.

A snapshot records only those people seen, or thought to be, sleeping rough on a single 'typical' night. It does not include everyone in an area with a history of sleeping rough, or everyone sleeping rough in areas across the October-November period.

The process depends on local agencies having, and sharing, intelligence about who is sleeping rough and where. This can be a challenge because patterns of rough sleeping often fluctuate, for example as people move between sheltered and unsheltered homelessness; in and out of prison and hospital; into and out of relationships; and as housing, support and income become more or less available.

Homeless Link recommends that local authorities and their partners do not rely solely on the annual rough sleeping snapshot estimate in order to understand local need and to plan prevention and responses. Engagement with people sleeping rough, and work to understand how to end rough sleeping locally alongside partners, should continue throughout the year. However, the snapshot provides a way of estimating the number of people sleeping rough across England on single night and assessing changes in rough sleeping since 2010. The process also offers an opportunity to improve partnerships and responses, especially for those areas seeing an increase in people sleeping rough.

Submitting the snapshot estimate and demographic information

The snapshot estimate process takes place across England between 1st October and 30th November.

Local authorities submit their snapshot estimate and demographic information using the MHCLG's DELTA online system. See the DELTA guidance 2020 for further information on how to set up your account and submit the data to the online system:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Data must be submitted to MHCLG by the local authority using DELTA by Friday 11th December 2020.

² www.mungos.org/work-with-us/chain/

Collecting demographic data

The rough sleeping snapshot also collects demographic data on the numbers of women, men, under-18s, under-25s, and UK, EU, and non-EU nationals represented among people sleeping rough. It is the responsibility of local authorities to submit aggregate data to MHCLG on the DELTA online system, alongside their final figure for the snapshot estimate. MHCLG will publish the data. All local authorities in England are required to submit this information to central government, as outlined in the Single Data List:

www.gov.uk/government/publications/single-data-list

Where demographic information is not known (for example, because someone was asleep when seen), this should be noted for each category as 'not known'. The demographic data is collected as an indication of the representation of particular groups among people who are sleeping rough. There is no requirement for people sleeping rough to share their information for the purpose of these statistics, as 'not known' can be used instead.

The 'not known' category should also be used if individuals do not want to provide demographic information. You should not guess or make an assumption about demographics, but instead use the 'not known' category.

Local Authority mergers

Where local authorities have merged, the process should be carried out within the new local authority boundaries in order to submit one set of snapshot and demographic information. For support choosing which process is most appropriate within new boundaries, please contact verifiers@homelesslink.org.uk.

Note that count-based estimates have one base of operations so that the Verifier is checking the whole process – if there are multiple bases, please contact Homeless Link at the earliest opportunity, as we may need to arrange multiple verifiers.

The Rough Sleeping Initiative (RSI)

The Rough Sleeping Initiative (RSI) funds local authorities to provide specialist services to help the most vulnerable people in society off the streets and into secure accommodation. Over 85% of local areas across England are now receiving funding and support via the RSI. Local areas receiving RSI funding are required to conduct a bi-monthly rough sleeping snapshot and submit this information to MHCLG.

The RSI rough sleeping bi-monthly snapshot estimates are not official statistics and are not independently verified by Homeless Link.

Every local authority, whether RSI funded or not, should submit their annual snapshot figure and demographic data for the official rough sleeping statistics using the process that will most accurately reflect the number of people sleeping rough in their area.

You are not required to complete a count-based estimate if you are a RSI funded area. Instead, your choice of approach should be based on your local context and should provide your area with the most accurate figure – please read the section below on ['Deciding which approach to use for the snapshot estimate'](#) to choose the right approach for your local authority area.

The definition of 'rough sleeping'

For the purpose of the estimates, people sleeping rough 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").

A bash, or bender, is a makeshift shelter structure, often made from tarpaulin or wood.

It is important that partner agencies taking part understand the definition of rough sleeping and do not include people in hostels or shelters, individuals who are sofa-surfing, people in campsites or other sites used for recreational purposes or organised protest, squatters or Travellers.

The rough sleeping statistics do not include every form of homelessness or everyone sleeping rough during October and November – it is a single night snapshot, which includes only people seen, or thought to be, sleeping rough on a single 'typical' night using one definition, as above.

Deciding which approach to use for the snapshot estimate

The local authority chooses the process that best meets its local context. While Homeless Link cannot tell local authorities which process to use, as part of our initial contact and verification we will ask why the choice has been made, and provide feedback to local authorities where we have concerns that the proposed approach might not produce the most accurate snapshot. If evidence comes to light that the chosen process has missed out people known to the local authority, or included people who are not within the rough sleeping definition, we may not be able to verify the local authority's figure.

Please note that all local authorities, including RSI funded areas, can choose from any of these approaches.

1. A **count-based estimate** is the number of people seen sleeping rough in the local authority area on a 'typical night' – a single date chosen by the local authority between 1st October and 30th November. It is a snapshot and will not record everyone in the area with a history of rough sleeping during the two months.
2. An **evidence-based estimate** is an evidence-based assessment by partners, leading to a single snapshot figure that represents the number of people thought to be sleeping rough in the local authority area on a 'typical night' – a single date chosen by the local authority between 1st October and 30th November. It is a snapshot and will not include everyone in the area with a history of rough sleeping during the two months.
3. An **evidence-based estimate including a spotlight count** is as 2 above, with the evidence sources including a street count, which might not be as extensive as the count-based estimate. All spotlight counts must take place after midnight (taking into account the night-time economy of the area).

Reasons to choose an **evidence-based estimate** approach:

- Sleep sites are inaccessible e.g. in woods or dispersed across rural areas
- Sleep sites are, during the night, unsafe to access or are hidden from sight
- The local authority cannot arrange safe access to known rough sleeping sites (e.g. parks, tower blocks) during a street count

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- There is regular intelligence gathering in place by a number of agencies and they are happy to share their intelligence with the local authority
- Numbers of people sleeping rough are consistently low, they are already in touch with services, and partner agencies agree this is the case (i.e. there are rarely people who are new or returning to the streets)
- The local authority can gather sufficient and reliable intelligence on people sleeping rough on the typical night via partner agencies
- Partner agencies agree to collect information for an agreed night and to share this with the local authority for the purpose of the estimate.

Reasons to choose an **evidence-based estimate, including a spotlight count** approach:

- There is a mix of visible/accessible and hidden/inaccessible locations in the local authority area
- The individuals sleeping rough or overall numbers of people sleeping rough in visible/accessible sites change frequently
- There are conflicting views from partner agencies about which method is right for the area
- Additional robust intelligence comes to light on the night of a planned street count about hidden rough sleeping (i.e. the process is expanded from count-based estimate to evidence based estimate meeting)

Reasons to choose a **count-based estimate** approach:

- People sleeping rough are in sleep sites that will be visible/accessible at night
- There are changes in the number, population or location of people sleeping rough where sites are visible (e.g. areas near transport hubs where transient groups sleeping rough make the figures unpredictable from one night to the next; areas that regularly see people new to the streets)
- There are difficulties forming an evidence-based estimate on the basis of the information available (e.g. lack of partners who have intelligence about where people are sleeping rough, or partner agencies refuse to share data)
- There is significant disagreement about the numbers between agencies and sites are visible/accessible.

Local authorities can decide which approach to choose in order to determine their snapshot estimate. They should use the approach that will most accurately reflect the number of people sleeping rough in their area and will provide the most robust estimate.

The decision should be made by early September so that there is time to plan next steps – a count-based estimate requires approx 6 weeks' lead-in time because it will involve partner agencies/volunteers.

For further guidance on using multi-agency meetings to agree which process to use, see the guidance '[Rough Sleeping Estimates intelligence gathering](#)'.

Changing the approach from year to year

Any decision to change the overall approach from one year to the next should be guided by whether it will produce the most accurate and robust figure. Homeless Link will ask for details of this decision-making in our initial contact and during the verification process to seek confirmation that the change meets the criteria set out in this guidance (above).

Note that undertaking a count at other times of year is not in itself sufficient reason to change between evidence-based and count-based estimates. Counts taken at other points of the year may not be a guide to levels of rough sleeping in October/November as there may be seasonal fluctuations in the level and patterns of rough sleeping. The existence of hidden rough sleeping sites should also be considered when deciding on your choice of approach.

Local authorities can adjust aspects of the process from year to year to achieve greater accuracy, for example:

- Choosing the typical night earlier (e.g. October) to reduce the risk of severe weather
- Changing night of the week in response to a busier night time economy
- Starting a street count later (e.g. 2am instead of midnight) in response to a busier night time economy
- Involving new partners and/or people with lived experience to improve evidence base/engagement
- Changing approach to take into account a significant change in the local context, such as boundary changes

Working with local partner agencies

Local partner agencies should be consulted to discuss what intelligence they have about rough sleeping locally to check if there are any factors that might affect the choice of a 'typical night' for the estimate.

The local authority should involve those local agencies that will have the most accurate information about who is sleeping rough.

Local partner agencies could include:

- Outreach teams
- Advice agencies
- Hostels, day centres, night shelters
- Housing department
- Social Services, Youth Workers, Probation
- Police, community safety teams
- Health and mental health services
- Housing Associations
- Park rangers
- Faith groups, soup runs, street pastors
- Refuse collectors, town centre/local retail security/managements, street wardens.

Involvement of an independent partner/s

In order to be verified by Homeless Link, at least one independent partner must be involved in the collection of rough sleeping figures for your area. An independent partner would be someone who is not commissioned or funded by the local authority.

The involvement of non-commissioned, independent partners is an essential element of any rough sleeping estimate, creating greater transparency about how the estimate is carried out and enabling Homeless Link to hear from independent partners as part of the verification process.

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The independent partner/s involvement will differ depending on your area's choice of approach. They will either attend the street count or the estimate meeting. They might also be involved in providing intelligence on the individuals rough sleeping. Identifying and contacting at least one independent partner should be part of the planning process. Where possible, we advise involving more than one independent partner.

Independent partners could include:

- ✓ Community groups
- ✓ Faith groups
- ✓ Soup kitchens
- ✓ Volunteers from the public

The following would not be classed as an independent partner:

- ✗ Police
- ✗ Statutory organisations
- ✗ MHCLG
- ✗ The Homeless Link Verifier
- ✗ Outreach team

Where the process does not involve at least one independent partner, or only those that are part of / commissioned by the local authority, Homeless Link will not be able to verify the process.

If you have any issues with involving at least one independent partner, please contact Homeless Link's Counts & Estimates Project Manager at the earliest opportunity: verifiers@homelesslink.org.uk

Guide to the evidence-based estimate approach



July – September

Appoint a Coordinator

The local authority lead should decide to coordinate their own estimate or give responsibility for the estimate process to an external Coordinator, for example a rough sleeping coordinator, Housing Options manager or outreach team leader. They will need to involve local partner agencies in the process, including at least one independent partner to attend the estimate meeting.

DELTA online data collection system

Check that the Local Authority lead has access to MHCLG's DELTA online data collection system. For guidance see:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Choosing the 'typical night'

The estimate is based on a single, typical night between 1st October and 30th November. The date can be at any point during October-November and can change from one year to the next (see above). The last possible date is night of 29th into morning of 30th November. However, in 2020 this falls on a Sunday night into a Monday morning, so the last likely date is Thursday 26th into Friday 27th November.

The Coordinator chooses the 'typical' night and agencies will collate intelligence in relation to this one night. It is good practice to liaise with neighbouring areas and, if possible, organise an estimate on the same night over a county or wider sub-regional area to minimise the risk of double counting.

Always use the date format 'night of x into morning of x' to avoid confusion e.g. 'the night of Wednesday 28th October into morning of Thursday 29th October.'

Estimates based on two or more nights cannot be verified.

In choosing a typical night, please take into account the following:

- Avoid a night when unusual local factors may distort the numbers, such as events, festivals, charity sleep-outs, higher levels of police activity or changes to service opening times.
- Identify an appropriate day of the week: choosing a weekend may mean that people bed down later or are less visible. Also, take into account whether certain days, such as those with club nights or football matches, may distort average levels of rough sleeping in the area.
- Whether an outreach shift is planned that can provide a spotlight count as a data source. Please note that all spotlight counts must start after midnight on the 'typical' night chosen and an outreach shift prior to midnight would not be classed as a spotlight count
- Make a contingency plan for severe weather conditions that change patterns of rough sleeping (see below).

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Update Homeless Link

All estimates are verified by Homeless Link. Contact Homeless Link's Counts & Estimates Project Manager at: verifiers@homelesslink.org.uk as soon as you have confirmed your approach, 'typical' night, and estimate meeting date so that we can arrange verification.

Homeless Link will send a verifier, in person or online, to some estimate meetings for verification. In other areas we will carry out telephone verification after the meeting. Where an estimate is informed by a spotlight count, Homeless Link will verify the overall estimate meeting rather than the spotlight count.

September

Involve partner agencies

Involving other agencies ensures that you will estimate the most accurate single figure, because:

- Agencies working 'on the ground' will have information about who is likely to be sleeping rough
- In local authorities that cover large areas, involving agencies that see people in particular areas (such as a day centre in a particular town, or a warden covering a particular park), or have an overall coverage (such as the Police), will ensure that rough sleeping is evaluated across the whole area
- Their knowledge, expertise, and intelligence about groups and individuals will provide a wider range of information on which to base discussion and analysis of rough sleeping numbers
- The single figure is less likely to be challenged, both because agencies have taken part in the process and because the single figure has been reached using a clear system of evidence gathering
- It enables local authorities to understand of the numbers and the issues, but also the potential solutions and opportunities for partnership working.

Local partner agencies for your estimate should include some or all of the following:

- Outreach teams
- Advice agencies
- Day centres, night shelters, hostels
- Housing associations
- Housing department
- Social Services, youth workers
- Police, Probation, community safety teams
- Health services, including mental health
- Faith groups, soup runs, street pastors
- Substance misuse agencies

Ideally, agencies will assign a lead representative who has access to the relevant information and also some knowledge about the situation of individuals sleeping rough, so that they can answer specific questions and reach reliable conclusions about the likelihood of someone sleeping rough on a particular night.

In rural areas, or areas with few or no specific homelessness services, other partner agencies may need to be approached for information. The Coordinator can assess whether it would be useful for them to attend an estimate meeting. These could include National Parks Service rangers, parish councils, refuse and street cleaning teams, town centre security and car parking staff.

All estimates will need involve at least one independent partner, in order to be verified. Please see the ['Involvement of an independent partner/s'](#)

Explain the process

Where possible, hold initial meetings or conversations with each agency to explain the process, identify any potential sources of disagreement and resolve them in advance. For example, some agencies describe their service users as sleeping rough, but instead they are sofa surfing or squatting, so won't fall into the rough sleeping definition used for the snapshot estimate process. Having these conversations at the start of the process should make the estimate meeting more effective.

Notify agencies of the date chosen for the 'typical night' of the estimate. Please use the format "the night of x into the morning of x" to avoid any confusion. Ask them only to share the date on a need to know basis to avoid causing changes in the pattern of rough sleeping that might distort the estimate.

Send this guidance to all agencies involved so that they understand the definition of rough sleeping and the process for the chosen approach.

Organise the estimate meeting

Confirm a date for the estimate meeting, **after** the 'typical night' chosen. A template invite letter can be found in the Forms & Resources section: www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

In areas where the local authority covers a large rural area, the Coordinator may decide to carry out the consultation with local partner agencies via alternative means, such as collecting evidence by email and holding a telephone conference to arrive at the single figure. Homeless Link must still be contacted to arrange verification.

COVID-19: *Social distancing may still be in place during the annual snapshot estimates. Local lockdowns may also occur in your area, preventing the estimate meeting occurring in person. For these reasons, we would advise that all estimate meetings are arranged as online meetings as a precaution. Please ensure partner agencies are aware of this and are able to access the relevant software for the estimate meeting to take place virtually.*

Please use online meetings software that is accessible for all partner agencies so they are included in the process and are able to provide their intelligence and listen to others intelligence. Some organisations restrict use of certain meeting software. Check in advance if this will cause any problems.

Explain who will be included in the estimate

Refer to the rough sleeping definition below:

"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")."

It is important that agencies taking part understand the definition of rough sleeping and do not include people in hostels or shelters, individuals who are sofa-surfing, people in campsites or other sites used for recreational purposes, organised protests, squatters or Travellers.

Agencies should understand that the purpose of the estimate is to assess the numbers of people rough sleeping on the typical night chosen, rather than a larger sample of street activity, hidden homelessness or people using homelessness services. This means that, for example, a person who sometimes sleeps rough

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but sometimes has accommodation/shelter will not be included in the estimate unless there is evidence that they did sleep rough on the chosen 'typical' night.

Some services record people as sleeping rough based only on self-reporting, which might conflict with outreach data about how many people are seen or, where there is no outreach provision, cannot be verified. These services might need support to assess whether someone is street homeless on the 'typical' night used for the estimate, for example by asking for additional information such as rough sleeping locations that can be checked by other agencies. Some people may be reluctant to share their sleep sites for safety reasons. Women and young people, for example, will often try to remain hidden. Agencies should be mindful of this and work on a case by case basis when considering thresholds of evidence for rough sleeping (see [Evidence of rough sleeping](#) section below).

Agree information sharing protocols

Estimates rely on agencies being able to share accurate basic information about an individual's situation on a particular night. There has to be a way of identifying individuals, by name or a unique identifier e.g. initials and date of birth. Without this there is a risk of double counting or including people who have been housed.

Where agencies already have a data sharing protocol in place, for example from a Rough Sleeping Action Group or other multi-agency work, this can be used. If no data sharing agreement exists, you can use the template in the Forms & Resources section:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Some agencies may decline to join the data sharing agreement. In this case you should explain the protocol and give reassurance about what the data will be used for and that it will be discarded following the estimate. If they still refuse let them know that, while they can still submit information, more weight will be given to those agencies whose evidence is supported by complete data, as otherwise there is a risk of arriving at a less accurate figure, for example due to double counting.

Agencies should collect evidence for the night of the estimate and either bring it to the estimate meeting to discuss verbally or send by email in a password encrypted file. You can either circulate the template estimate form (see [Forms and Resources for Local Authorities](#)) or create your own form.

A week before the estimate night

Severe weather

Check the weather forecast leading up to the night chosen for the estimate. If there is severe weather this could change patterns of rough sleeping, especially if the severe weather emergency protocol (SWEP) is in place. If this happens, you might need to change the date in order to ensure agencies are basing intelligence on a typical night. Please inform Homeless Link if you decide to change your date, as we will need to make new verification arrangements.

Night of, and morning after, the estimate

Partner agencies note any evidence of people sleeping rough, including observation and self-reporting, including specific details of location and individuals where available.

After the 'typical' night

The estimate meeting (note that the estimate meeting cannot take place on a date before the chosen 'typical' night)

Holding an estimate meeting is the most effective way to collate the evidence of rough sleeping on the chosen night and to discuss any potential duplicates or misinformation. Where disagreement is likely to occur, or where there are conflicting approaches between agencies on the scale of the issue or potential solutions, a meeting is more likely to get to the bottom of the issue.

Homeless Link verifiers will attend a percentage of estimate meetings as part of the process based on a combination of concern/risk, geography and availability. The Coordinator or any partners can invite Homeless Link to their meeting, request additional support or raise concerns for Homeless Link to look into. Please contact verifiers@homelesslink.org.uk if you would like to request a Homeless Link verifier to attend your estimate meeting.

If there is already a local forum or network which brings together key agencies working with people sleeping rough, this can be used for the Estimate Meeting (with expanded membership, if needed) as long as sufficient data sharing protocols are in place. If the local authority has a rough sleeping action group or similar meeting, the estimate process will be an extension of their ongoing work to identify and assist people sleeping rough.³

Please refer to the document 'Forms and Resources for Local Authorities' for a template agenda and notes for the estimate meeting: www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

If, despite best efforts, an estimate meeting is not practical, ask agencies to submit their evidence in a password encrypted email file or verbally in a telephone conference. Collate the evidence and resolve any issues by emailing or speaking to agencies.

During verification, Homeless Link will check which agencies have been involved. We expect that estimates using the evidence-based process will show more than one data source.

Where the process does not involve at least one independent partner, or only those that are part of/commissioned by the local authority, Homeless Link will not verify the process.

Evidence of rough sleeping

Each agency should present information on who they think slept rough on the night of the estimate, with reference to the definition of rough sleeping above. Evidence should be provided for each individual.

Examples of evidence that an individual slept rough include:

- Individual seen bedded down by the agency
- Individual seen bedded down by another partner agency
- Individual known to the agency and it is clear that they do not have accommodation that they can occupy (people sleeping rough over a longer period/with a history of rough sleeping)
- Individual self-reports sleeping rough over the period alongside evidence that they are sleeping rough (use of services, carrying/storing belongings, appearance – while bearing in mind many people sleeping rough are well-presented, other known factors)

³ www.homeless.org.uk/our-work/resources/effective-partnerships

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- Information that demonstrates that someone known to be sleeping rough intermittently did sleep rough on the night in question (e.g. they weren't seen in their hostel; were at the day centre early; were discharged from prison or hospital shortly before)

The final decision on the estimated single figure is made by the local authority, taking into account all the evidence and eliminating duplicates or unsubstantiated data. The Coordinator might need to collate further information following the estimate meeting in order to resolve any outstanding questions (particularly where people are known to move between local authority boundaries, as there is a risk of duplication with neighbouring estimates). Partner agencies should raise concerns with Homeless Link if they think decisions have been made that are not in line with this guidance by emailing: verifiers@homelesslink.org.uk

Verification

Coordinators should be liaising with Homeless Link throughout the whole process to ensure their estimate is as reliable as possible. Homeless Link should be invited to the estimate meeting – we will identify some meetings for verifiers to attend, others will be verified by telephone.

The verifier will be checking that:

- The Coordinator has followed the guidance
- A 'typical night' has been chosen, in line with this guidance
- The Coordinator has contacted a range of local agencies, including relevant voluntary and community organisations, and invited them to be part of the estimate process
- At least one independent partner has been involved in the process
- Agencies have been given sufficient information to participate in the process and provide the information required
- Agencies understand the principle of the 'typical night' and the definition of rough sleeping
- There is a data sharing agreement in place between agencies
- Enough data and evidence has been gathered to resolve conflicting information and avoid double counting
- The estimate relates to the 'typical night' chosen, not a wider time period or group of homeless people
- Intelligence has been examined and discussed to arrive at a reliable figure of people sleeping rough on the night chosen for the estimate
- There is demographic data for each person sleeping rough and any gaps in data are explained and logged as 'not known'
- There is a snapshot estimate to be submitted to MHCLG

Homeless Link might not be able to verify an estimate if, for example: there were no independent partners involved; there was a lack of robust evidence that people included were sleeping rough on that night; or evidence was not included about known sleep sites or individuals sleeping rough.

After the estimate process ends, the Verifier will complete the verification form, which will be reviewed by Homeless Link's Project Manager before being returned to the local authority lead.

Submitting the single figure

Once the estimate has been verified by Homeless Link **and this completed form received by the local authority**, they should submit the single figure and demographic data using the MHCLG's DELTA online system. See the [DELTA guidance](#) for further information.

Data must be submitted to MHCLG by the local authority using DELTA by Friday 11th December 2020.



Guide to the evidence-based estimate, including a spotlight count approach

COVID-19: Contingency plans should be put in place in case the spotlight count is unable to go ahead.

Please refer to the [Guide to the evidence-based estimate approach](#) to arrange your estimate meeting aspect of your chosen approach.

Spotlight counts are a way to include count data alongside partner agency intelligence. This can be particularly effective for areas with people sleeping in a mix of urban and rural locations, or where there are a few hotspots with fluctuating numbers of people sleeping rough that require counting for accuracy.

All spotlight counts must take place after midnight (taking into account the night-time economy of the area). This may mean that certain outreach shifts cannot be used as a spotlight count due to the timings of these shifts. Starting after midnight is required to avoid counting people who are part of wider street activity but have somewhere to stay and will not bed down for the night.

Other than starting after midnight, Coordinators can decide to what extent a spotlight count follows the count process detailed below. For example, involving independent partners will give the count evidence more credibility, but may cause resource issues if the same agencies are being asked to attend the estimate meeting. However, please note that at least one independent partner will need to be involved in the process, in order to be verified by Homeless Link (please see the [Involvement of an independent partner/s](#) section above).

COVID-19: Smaller teams during the spotlight count would be appropriate. There should also be a reduced number of people at the count base, in order to follow [social distancing](#).

Please note that spotlight counts should only be used alongside other data sources – only choose an evidence-based estimate if you are confident that there will actually be a range of different evidence sources (e.g. intelligence from park rangers about rural sites, or from a day centre about hidden sites), as well as the spotlight count, to provide an accurate snapshot figure. Otherwise you should consider using a count-based estimate instead.

Follow the evidence-based estimates guidance, above, for the estimate meeting to take place after your 'typical' night chosen and include the spotlight count as one of your data sources. The spotlight count will need to take place on the 'typical' night you have chosen.

Pre-count activity

Please note that 'pre-counts' by outreach or police teams on the evening of the 'typical' night chosen should not be used, as they create a risk of disruption. See below for further information on [pre-count activity](#).



Guide to the count-based estimate approach

COVID-19: Make contingency plans in case the count is unable to go ahead due to lockdown, staff sickness/isolation etc.

July – September

Appoint a Coordinator

The local authority lead should decide to coordinate their own estimate or give responsibility for the count-based estimate process to an external Coordinator, for example a rough sleeping coordinator, Housing Options manager or outreach team leader. They will need to involve local partner agencies in the process, including at least one independent partner to attend the estimate meeting.

COVID-19: If the count coordinator has to [self-isolate](#), or will be self-isolating on the night of the count, then you will either need to change the date of your 'typical' night chosen (if there is still time during the allocated October-November period) or change your choice of approach, unless there is a deputy coordinator who is fully prepared and can deliver the count safely.

DELTA online data collection system

Check that the Local Authority lead has access to MHCLG's DELTA online data collection system. See the following link for guidance on how to set up a DELTA account:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

September

Choosing the date and time

Allow **at least 6 weeks** to plan the count. Activities leading up to the count will include:

- Gathering intelligence from partner agencies
- Preparing a data protection statement
- Organising volunteers
- Planning the night's activities
- Liaising with the police
- Arranging a Homeless Link verifier.

The count must take place on a single 'typical' night. If it spreads over two or more nights, the process cannot be verified.

COVID-19: This year a number of issues may affect the count going ahead. For example, local lockdowns, the count coordinator self-isolating, and/or a number of staff and volunteers having to self-isolate. Therefore, we would advise choosing an earlier date (e.g. in October) so if the count is unable to go ahead, it can be rearranged for a different 'typical' night (before the end of November).

When choosing a date, you should:

- Avoid a night when unusual local factors may distort the numbers, such as events, festivals, charity sleep-outs, higher levels of police activity or changes to service opening times

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- Identify an appropriate day of the week: people may bed down later or be less visible on weekends. Also take into account whether certain days, such as those on which football matches or club nights take place, may distort average levels of rough sleeping in the area.
- Make a contingency plan for severe weather conditions that change patterns of rough sleeping (see below)

The count night should not be used for media activity – the presence of film crews or photographers means that it is not a typical night, for example because people may move sleep sites to avoid being filmed or photographed. Journalists can be present during the count provided they follow the guidance.

The date of the count should only be shared on a 'need to know' basis in case this causes a change in the pattern of rough sleeping, resulting in a less accurate figure.

Start times should be tailored to meet local circumstances. The earliest permitted start is midnight. In cities and towns with a busy night time economy, a start time of 2am or even later is more appropriate to include people who bed down after pubs and clubs close. In rural areas, where the majority of people are sleeping rough away from built-up and well-lit areas, counts may be conducted in the hours after dawn.

There is no fixed duration for a count – it will depend on geography, number of counters, number of people sleeping rough, and what occurs as the teams are talking to the people they meet e.g. getting people to shelter/hubs, or dealing with emergencies. Typically counts start between 12-2am and finish between 3-6am. In most cases, if appropriate intelligence has been gathered and enough volunteers recruited, counts take no more than 2 to 3 hours to conduct.

Local authorities without regular outreach might want to do a street needs audit with a smaller team in advance of the count to gather intelligence about sleep sites, so that the count can be planned around known sleeping sites. In most areas it is not feasible to check every street/alley/car park etc, so some way of targeting teams is needed.

Pre-count activity

Please note that 'pre-counts' by outreach or police teams on the evening of the 'typical' night chosen should not be used, as they create a risk of disruption. Homeless Link may refuse to verify your count if it becomes clear that people who were sleeping rough during the pre-count are no longer visible (i.e. the pre-count moved them on, whether intentionally or not).

Homeless Link may require people housed during the pre-count to be included in your final figure, as they would have been counted if found later that night.

If outreach teams are in the habit of contacting people during an earlier evening pre-count because they are not visible at night (e.g. because they sleep in tents), the local authority should consider whether this is grounds to choose an evidence-based estimate, including a spotlight count approach instead.

Update Homeless Link and book your verifier

All estimates are verified by Homeless Link and we aim to verify all count-based estimates in person. Contact Homeless Link's Counts & Estimates Project Manager at verifiers@homelesslink.org.uk as soon as you have confirmed your approach and count date so that we can arrange verification – please let us know as early as possible and notify us immediately if your date changes.

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Counts need to be verified to ensure that they have been carried out safely and in accordance with this guidance. Verifiers are trained and supported by Homeless Link. They are associates or volunteers drawn from our staff, membership, partners, other local providers and the local community. The verifier's role is to take part and observe the count, not to organise it or lead on it during the night.

Coordinators must communicate with the verifier before and during the count. It is the Coordinator's responsibility to confirm the date, time and venue of the count in advance with the verifier. If the verifier has not replied to confirm their attendance at least two weeks before the count, please alert Homeless Link's Counts & Estimates Project Manager.

Early / mid-September

Recruiting counters

Many local authorities look for volunteers from their own workforce (in return for time off in lieu or overtime), as well as looking for volunteer counters from the local statutory and voluntary sectors or faith and community groups, e.g. police, park rangers, day centre staff, street pastors and advice workers. This is a good opportunity for agencies to learn more about each other's work. If there is a local outreach team, they should be fully involved. Local authorities should always involve volunteers who are independent of the council and its outreach team (i.e. non-commissioned), as this strengthens the credibility of the count.

Where the process does not involve at least one independent partner, or only those that are part of, or commissioned by, the local authority, Homeless Link will not verify the process. Please involve at least one independent partner in order to be verified by Homeless Link.

If local authorities would like any help with engaging faith & community groups to be involved in the count, feel free to contact Housing Justice as follows:

- London – Mark Brennan, London Catalyst Team Leader:
m.brennan@housingjustice.org.uk
- Outside London – Vanessa Nicholls, Best Practice & Innovation Team Manager:
v.vicholls@housingjustice.org.uk

All those involved in the count should be asked not to share the date of the 'typical' night chosen beyond essential contacts.

COVID-19: This year counters (including volunteers from your own workforce and volunteers from other partner agencies) will need to be COVID-19 [symptom free](#) in order to attend the count. All counters should follow guidance on [how to volunteer safely](#).

Mid-September – count night

Organising a count base

A count base is necessary as it allows teams to be briefed beforehand, to ask any questions and to de-brief and share figures afterwards. It also ensures access to toilets and handwashing facilities during the night.

COVID-19: Coordinators should make an assessment on how the base of operations is able to meet current guidelines on [social distancing](#). The count base should have a COVID-19 safe risk assessment in order to be used on the night of the count. Please notify Homeless Link at the earliest opportunity if you have any issues with your count base: verifiers@homelesslink.org.uk

Mapping, counting teams and access

It is good practice to liaise with neighbouring areas and, if possible, organise a count on the same night over a county or wider sub-regional area. This reduces the risk of double counting people who move across local authority boundaries. Even if the count starts at midnight, always use 'night of into morning of' to ensure clarity about the date and aid travel/work planning e.g. night of Weds 15th into morning of Thurs 16th.

You don't need to cover every street or park in the local authority area, and it's unlikely you'll have enough counters to do this. It's better to use your prior intelligence gathering to focus on 'hotspot' areas where people are known to sleep and areas where people are sometimes seen bedded down. If you know that sleep sites are occupied but inaccessible or unsafe, consider using the evidence-based estimate meeting process including a spotlight count to achieve greater accuracy.

Coordinators should divide the area being counted into segments for each counting team.

COVID-19: Use smaller counting teams (2-3 people) in order to follow [social distancing](#).

Each counting team will need a map clearly showing the boundaries of their segment and any hotspots within it. Agree exact boundaries, identifying individual streets or parts of streets, and draw them on the map. It is important to be precise about boundaries so that areas are not double counted or missed entirely.

Wherever possible, the areas covered should be well known to the teams and individual counters. The most effective counters are those with knowledge of where people are likely to be sleeping rough in that area, for example workers from local outreach teams. Try to include someone with knowledge of local rough sleeping in each team, alongside volunteers from other agencies and [independent partner/s](#).

Check that you have recruited enough volunteers to cover each mapped segment. It is advisable to plan at least one mobile counting team in a car to cover outlying areas and support other teams if they encounter delays. At least one person, usually the Coordinator, will need to stay at the count base to deal with queries and check in with counting teams during the night.

Note that the Verifier has to be in the first team to return to the base, or they should be collected by the mobile team/by taxi in order to get back to base to meet the first counting teams back.

Plan ahead to gain access to non-public areas where people may be bedded down (e.g. hospital or college grounds, parks, building stairwells, car parks). Do not plan access for volunteer counters to areas that will be unsafe. You might need to contact police, park rangers or security firms to gain access and support the count. In previous years, some local authorities obtained keys to stairwells of flats where people were likely to be sleeping, which ensured counters could check these areas. This approach is recommended, as long as safety is maintained.

There are particular challenges associated with counting in rural and urban areas, and with certain groups of people sleeping rough. Please refer to the document 'Forms and Resources for Local Authorities' for further information: www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Homeless Link

Preparing a data protection statement

The Coordinator should provide copies of a data protection statement on the night of the count, in case it is requested or to assist the person doing the count to answer any questions. The GDPR lists the kinds of information that must be provided. See the 'Data sharing' section below.

Making contingency plans – emergency accommodation and severe weather (SWEP)⁴

Speak to local homelessness and housing services to agree the response to people found sleeping rough who want to access accommodation and support e.g. a hub, B&B or hostel. The count should not stop people from accessing accommodation. They will still count towards the single figure even if housed during the count.

Unusual circumstances such as severe weather conditions (e.g. activation of the severe weather emergency protocol (SWEP), snow, heavy rains or flooding) or man-made events such as riots or protests may have an impact on numbers. In some circumstances, it may be impossible for the count to go ahead.

If the planned count coincides with unusual circumstances – in particular activation of SWEP – the Coordinator, in consultation with the verifier, may decide on one of the following courses of action:

- Postpone the count – it still has to happen by 30th November.
- Proceed as a spotlight count that is used to inform an evidence-based estimate meeting, based on actual numbers counted plus others, such as people in SWEP provision on the night of the count, who would otherwise have slept rough.⁵ This is the most common approach due to the strict Oct-Nov timeframe.
- Cancel the count and instead follow the evidence-based estimate meeting process, based on a single typical night before 30th November where SWEP is not in force. You will need to follow the guidance, choose a new date and plan an estimate meeting with partner agencies.

2 weeks before the count

Information to/from counters, Homeless Link Verifier and police

Confirm availability of counters and Verifier, their contact details and addresses. Ensure there is a plan for everyone to get home safely – it is the Coordinator's responsibility to provide transport for counters and Verifier. Depending on the start time and location of the count base, transport to the count may also be required. Please do not ask counters to arrive more than an hour before the count starts – it's already a long night for everyone involved.

Send the 'Briefing for street count teams and volunteers' to the counters along with details of the date ('night of x into morning of y' format), time and base of operations for the count. Ask them to bring mobile phone, torch and ID if possible. Confirm their transport home and get their postcode details if you need to arrange transport.

Speak with the Verifier to talk through the plan for the count. Notify Police of the count taking place.

⁴ Guidance on cold weather provision and SWEP:

www.homeless.org.uk/our-work/resources/guidance-on-severe-weather-emergency-protocol-swep-and-extended-weather-provision

⁵ If an estimate is submitted on the basis of a count alongside actual number placed in SWEP, assessment and intelligence information must be used to ensure that only those people who would have slept rough on that night are counted, which might be different to the total number of people in SWEP

The week of the count

Practical preparations

Ensure that you are ready for the count night:

- **COVID-19:** Check [local restrictions](#) and contact Homeless Link and the Homeless Link verifier immediately if your area is on the list as the count will not be able to go ahead
- Check the weather forecast and review SWEP contingency plan
- **COVID-19:** Check risk assessments have been completed, a contingency plan is in place, and all counters have been asked to read the relevant PHE guidance
- Book taxis to/from venue for counters and verifier or put the taxi firm on standby. **COVID-19:** Ensure counters have a suitable [face covering](#) when travelling in a taxi.
- Print maps for each counting team showing the area and any hotspots to cover
- Ensure each team will have a torch and phone, plus alarms and reflective jackets/armbands if using **COVID-19:** Ensure [hand sanitiser](#) is distributed to counting teams.
- Prepare packs for counting teams: map, pens, definition of rough sleeping, ID letter, H&S checklist, rough sleeping count forms, any relevant local service info, language chart. **COVID-19:** packs include [face coverings](#), hand sanitiser
- Assign counters to teams, including an outreach worker or someone with local knowledge in each team. Put the Verifier in the team that will return first or arrange for them to be picked up and brought back to base before any counting teams return.

The night of the count

Count process

- Check availability of emergency accommodation/assessment hubs on the night
- Meet the Verifier slightly earlier than the counters to run through plan for the night (or do this earlier on the phone)
- Ensure each counting team has a mobile, torch and pack – check you have the right mobile numbers
- Talk through the Briefing for Count Teams, introduce the Verifier and answer any questions
- Agree timing of check-in calls to teams during the count
- As each team returns, ask them to go through their count form with the Verifier
- If possible, offer hot drinks/snacks at the base of operations (within COVID-19 guidance)
- If there have been any safety concerns during the count, ensure counters are debriefed and agree a follow up call
- Agree a final figure and demographic information with the Verifier once all forms have been returned
- Check that each counter and the verifier has a safe route home – coordinate sharing taxis/lifts home

Safety considerations

Count Coordinators have a responsibility to ensure the safety of all those involved in the rough sleeping count. You should balance the need to keep people safe with the need to gather as much reliable information about people sleeping rough as possible.

In order to get this balance right, the Coordinator should:

- **COVID-19:** Ensure all counters are familiar with the [social distancing](#) and [self isolation](#) guidance prior to the count. Individuals should not attend the count if they display any COVID-19 symptoms.

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- Give clear guidance to counters about whether or not to wake up any unknown/new people found sleeping rough during the count. This would be to find out more about them and to offer support and, where available, assessment/accommodation. In most cases, unless counters are outreach workers, it will be safer not to wake the person, but to leave some information about local services and arrange for outreach to look for them on the next shift. Please note that demographic information can be recorded as 'not known'.
- Organise the count so that counters work in teams of at least two and have relevant equipment e.g. torches, phones. The Coordinator should be aware of each team's planned route to and from their counting area and check in with them by phone at least once during the count.
- The conduct of the counters is of paramount importance and the pre-count briefing should set clear expectations. They should be given clear guidance beforehand about their role and should be sent home from the count if they are unsuitable (e.g. intoxicated).
- Counters should be told not to enter areas that they feel are unsafe without support from the police.
- Local police should be asked to assist with counts and are often willing to do so. Having police officers available on the night means that there are more options available around waking up unknown/new people to get information and offer support, but this must be done sensitively.
- A safe initial meeting and debriefing venue should be arranged, such as a local authority building or day centre, where counters can meet and return to once they have completed their section. There should be clear arrangements for getting to and accessing this building. **COVID-19:** *Appropriate measures should be followed whilst at the count base, including guidelines on [working safely](#).*
- Safe transport from (and potentially to) the count base is the local authority Coordinator's responsibility.
- Counters should carry identification and a letter from the local authority explaining their purpose in being out late at night and in unusual locations. It is common for counters to be challenged, for example by building concierges and car park security guards.
- On the night of the count, the Count Coordinator should go through the safety procedures carefully with counters and give counters time to ask questions. This will cover: when to call in, how to respond to emergencies, when to leave an area, and how to deal with any aggressive behaviour. **COVID-19:** *Please discuss any COVID-19 related adjustments with everyone involved in the count and ensure that COVID-19 risk management actions are explained to everyone involved.*
- While rare, there have been incidents of concern during counts – Coordinators may want to seek advice from Police in advance about potentially risky areas and adjust patches/exclude areas accordingly. If safety concerns mean that you are unable to visit certain areas, yet there is intelligence that individuals will be rough sleeping in this area on the 'typical' night, then a count-based estimate would not be suitable and you may not be verified as the figure would be inaccurate for your area. Please consider an evidence-based estimate, including a spotlight count instead to ensure all individuals (including those in the inaccessible unsafe areas) are counted. If you change approach due to intelligence, then inform Homeless Link at the earliest possible stage as this will affect the verification process.

Please also refer to the Count Risk Assessment (for coordinators) and Health & Safety Checklist (for counters) in the Forms & Resources section of this toolkit online:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Briefing the counters

The Count Coordinator should start the evening at the count base with a briefing session for counters. The briefing is to ensure that everyone understands:

- The definition of sleeping rough
- The role of the Count Coordinator and the Verifier
- Any local arrangements for recording detail of individual people sleeping rough (MHCLG only require the single figure and demographic data) and support/accommodation options on the night
- Safety considerations, as listed above, *including COVID-19 risks and adjustments*

Please also refer to Coordinator's Briefing Notes in the Forms & Resources section of this toolkit:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Interventions on the night

It is strongly recommended that prior arrangements are made so that emergency beds are available for people found on the count who want to move off the streets. If people sleeping rough are supported with any intervention on the night of the count (including referral to an assessment hub, use of emergency services, referral to SWEPP or other emergency provision) they should still be counted as bedded down for the purposes of the count and recorded within the single figure. If someone is asleep and you have made the decision not to wake the individual because you have no offer of accommodation, leave a letter or card to let them know how they can contact the outreach team, local authority or other forms of support. Where possible, make a plan to return to their sleep site the following night.

Recording the data

On the night of the count, local authorities should use the Rough Sleeping Count Form (see Forms and Resources for Local Authorities) or create an alternative form for local use. The local authority should ask counters to collect any data about individuals, trends or hotspots that will be relevant to local planning. The Homeless Link Verifier will ask about these plans, as well as verifying basic demographic data on gender, age and nationality.

- Counters should record each individual person on a separate line on the form, rather than writing totals on the form which cannot be verified as an accurate record.
- Information about each person sleeping rough may be recorded from previous knowledge of the person and their sleeping site, rather than having to wake them.
- If an individual is not known, and where it is safe to do so (see above), the counter may attempt to wake each individual to record their details. Even if the counter cannot observe or establish any details about the individual (for example because they are unable to wake them and they are covered up) they should still record them individually and use the 'not known' category for demographic details, unless counters know the individual (from the individual accessing their service, for example) and their details.
- Establishing the identity of a person sleeping rough on the night of the count will help with follow-up and referrals. However, note the data protection rules below.
- The count process includes collecting data on the number of EU (excluding UK) and non-EU nationals represented among people sleeping rough. To plan local responses for migrants sleeping rough see Homeless Link's guidance: www.homeless.org.uk/our-work/resources/working-with-eea-nationals and www.homeless.org.uk/our-work/resources/supporting-people-with-no-recourse-to-public-funds. Note that all people recorded and verified during the count must be included in the single figure, regardless

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of nationality or recourse to public funds and including people whose faces are covered and are not woken. Every person seen that meets the rough sleeping [definition](#) must be counted towards the final figure for your area.

- As counters might find people who do not speak English as their first language, it's useful to give them a language ID chart. This enables the person sleeping rough to point at their preferred language. Use the Refugee Council chart and provide copies for each counting team:
www.esht.nhs.uk/wp-content/uploads/2017/07/Language-identification-chart.pdf
- It is useful for counters to give as much information as possible on the location of people sleeping rough, as this may help with future planning of services, as well as more immediate offers of support.
- Counting forms must be completed on the night of the count and shown by the counters to the Verifier on that night so they have a chance to ask any questions prior to verification. Ideally, this should happen without the Coordinator present. Counting forms are kept by the local authority and destroyed following your data protection policies.
- The Homeless Link Verifier will not confirm verification with you on the night, or provide you with the verification form. The verification form will need to be reviewed by the Homeless Link Counts & Estimates Project Manager who will then send the form to you, once reviewed.
- **Data should not be uploaded to DELTA until the completed verification form has been sent from verifiers@homelesslink.org.uk**
- If demographic data changes (e.g. new information comes to light), inform Homeless Link as soon as possible as we will be cross-checking our verified data (the data on the verification form) with data submitted to DELTA. If the data does not match, and discrepancies are not resolved in time, then your submission will not be certified.
- Details of individuals sleeping rough are confidential. Information should be stored and shared in line with the protocol of the local authority (or the agency coordinating the count), which may include information sharing arrangements with relevant local services.

Data sharing

- As holder and owner of the personal data collected, the local authority is the data controller. It is their responsibility to ensure that the correct procedures are in place to adhere to the Data Protection Act 2018.
- Neither Homeless Link nor MHCLG are data controllers in this process, as no personal data is shared with either organisation.
- As part of the count, it must be made clear to individuals that they are providing their personal details (name, date of birth) voluntarily, and are not obliged to provide them. If a person refuses to give their personal information, they should still be recorded as sleeping rough, and demographic information including gender, nationality, and age will be recorded as "not known" if this is not known.
- The Count Coordinator should provide copies of a data protection statement on the night of the count, in case it is requested or to assist the person doing the count to answer any questions. The GDPR lists the kinds of information that must be provided.

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After the count

The Homeless Link Verifier will seek to raise and resolve any issues with the Coordinator on the night of the count. They will send the completed verification form to Homeless Link's Counts & Estimates Project Manager, on their next working day following the count. Homeless Link will review the verification form before returning it to the Coordinator.

Please do not submit your data to DELTA until you have received the verification form with the verified data from verifiers@homelesslink.org.uk

After verification, local authorities should submit the single figure and demographic data using the MHCLG's DELTA online system. See the DELTA guidance for further information:

www.homeless.org.uk/our-work/resources/rough-sleeping-estimates

Data must be submitted to MHCLG by the local authority using DELTA by Friday 11th December 2020.

Common issues to consider in your planning

- **Changing approach.** Areas are able to change approach but this should be led by intelligence. Homeless Link must be updated if you have changed approach as this can affect how the data needs to be verified.
- **Are you a RSI-funded area?** If so, this should not have any effect on the annual snapshot estimates. Please read the section on [RSI](#).
- **Post-estimate meetings.** Estimate meetings must not be held prior to the 'typical' night chosen. This will not provide accurate data, as you cannot predict who will be rough sleeping on the 'typical' night ahead.
- **Evidence for estimate meetings.** If you choose an evidence-based estimate, including a spotlight count approach the estimate meeting should discuss intelligence and evidence. If there is no additional information or data sources discussed then essentially your approach will be an unverified count. Make it clear to partner agencies what [evidence](#) should be prepared and shared by them prior to the meeting.
- **Cross-LA coordination.** We advise local authorities coordinate their date with neighbouring local authorities to avoid duplication of individuals being counted. However, we do not advise that you coordinate your choice of approach with neighbouring local authorities. Please read the section on the different [approaches](#) to choose the correct approach for your local authority.
- **The timing of your spotlight count.** Spotlight counts will not be verified if the count starts before midnight.
- **The day of your 'typical' night.** In previous years, Thursdays have been a popular choice of day to carry out the snapshot estimate. However, for some areas, there is a busy night-time economy on this particular night. Please consider if your area has a busier night-time economy on the day you have chosen, and if so, choose a different day.
- **Pre-count activity.** Please see the section on [pre-count activity](#).