



Proposed changes to guidance on evaluating the
extent of rough sleeping
Consultation



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Consultation

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Document description

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Department	Communities and Local Government
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Description	Public consultation on proposed changes to guidance on evaluating the extent of rough sleeping.
Method of response	<p>Interested parties are invited to respond by email to:</p> <p>Jose.espineira@communities.gsi.gov.uk</p> <p>Or in writing to:</p> <p>Jose Espineira, Housing Standards, Homelessness and Support Communities and Local Government 1st Floor, E2 Eland House Bressenden Place London, SW1E 5DU.</p>
Compliance with the Code of Practice on Consultation	As this is a technical consultation on statistical outputs it is not a formal 12-week public consultation.

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1. Background

1.1 Introduction

In 1996 a methodology for assessing levels of rough sleeping was established based on a one-night count of people found “bedded down”. This methodology has been used since to track progress against a total of 1,850 found on counts in 1998.

The Government would now like to review the way rough sleepers are counted so that figures better reflect the true scale of the rough sleeping problem across England. This consultation proposes changes to existing guidance *Evaluating the Extent of Rough Sleeping* published by Communities and Local Government in 2007. New additional estimates have also been published today alongside this consultation, including estimates from a further 256 councils on the scale of problem in their area, many of them for the first time.

1.2 Document purpose

This document describes a set of proposed changes to the existing rough sleeping guidance. It also gives users of the rough sleeping figures and those involved in evaluating the scale of rough sleeping in their local area an opportunity to comment on the proposals. This is a public consultation and the Department particularly welcomes responses from local authorities and the voluntary sector.

Information on how to respond to this consultation is found on the first page of this document.

The consultation is being carried out in line with central guidance, namely the UK Government’s *Code of Practice on Consultation*. Details of the consultation criteria are attached at Appendix 2.

2. Scope

This consultation proposes changes to the existing guidance *Evaluating the Extent of Rough Sleeping*. The aim of the consultation is to provide an opportunity for comment and to ensure that any changes made to the guidance strengthen the street count methodology, allow local authorities not counting to produce robust estimates and enable an assessment of the true scale of the rough sleeping problem.

The main changes proposed to the guidance are outlined in the following section. These changes will affect all local authorities in England.

3. The proposal

The main changes proposed to the guidance are outlined below. A draft copy of the revised guidance is given in Appendix 1. The Department is seeking views specifically on the proposed changes, on the content of the guidance in general and welcomes views on additional measures for improving the guidance.

Main changes proposed to *Evaluating the Extent of Rough Sleeping* guidance

1. Conducting street counts to be a choice for individual local authorities based on their assessment of whether the local rough sleeping problem justifies counting – For instance, where local intelligence suggests there are rough sleepers in the area on a regular basis or that numbers may be increasing. Counts to no longer be required by CLG when local authorities assess that they have more than 10 rough sleepers as was previously the case.
2. Local authorities should submit an estimate of the number of people rough sleeping on a typical night. They should consult with and gather information from all agencies dealing with rough sleepers in their area, including the local community, to help compile and agree the figure. The rough sleeping count guidance has been revised to include a new proposed section offering local authorities some basic guidance on how to estimate numbers.
3. The definition of rough sleeper to be expanded. The definition of what constitutes being “bedded down” to be changed to include rough sleepers about to bed down (e.g. sitting or standing near their bedding but not actually lying down). The definition would specifically include people in tents (not on campsites or on organised protests).
4. The proposed guidance encourages neighbouring authorities to count on the same night and to count on a sub-regional or regional basis to avoid missing (or counting twice) rough sleepers who move back and forth between local authority areas.
5. It also proposes an update to the recommended starting time for counts to 2.00am as the current start time of midnight means many rough sleepers are not yet bedded down (e.g. in city centres) and are not therefore being counted.
6. CLG will no longer provide officials to attend and oversee that counts are being conducted in accordance with the agreed methodology. The responsibility for providing independent verifiers to attend counts will become a responsibility of Homeless Link (the national membership charity for frontline homelessness agencies) and they will draw volunteers from their member agencies and interested faith groups.

4. Consultation and implementation timetable

1	Consultation opens	23 July 2010
2	Consultation closes	3 September 2010
3	Response to consultation published on CLG website	October 2010
4	Estimated date of implementation of changes to the data collection	October 2010
5	Estimated date of implementation of changes to the published information	Early 2011

Appendix 1: Draft guidance *Evaluating the Extent of Rough Sleeping*

Introduction

Rough sleeping remains the most visible and damaging manifestation of homelessness.

This guidance is intended to help local authorities, in partnership with other local agencies, to evaluate the extent of rough sleeping in their area by carrying out a count of people sleeping rough or by estimating the number of rough sleepers on a typical night in their locality.

Final guidance will be published in early September and the new methodology should be used for carrying out counts and providing estimates from 15 September 2010.

Supplementing formal rough sleeper count data with information provided through estimates will allow meaningful trend analysis over time and also ensure that the published figures provide a complete picture of rough sleeping levels across England.

Local authorities need a good understanding of this information as part of their local homelessness prevention efforts. This will allow them to commission services to prevent and tackle rough sleeping, and identify gaps in services

The Government will publish an annual national figure drawing on information from counts and estimates from all local authorities.

Carrying out a rough sleeping count

Introduction

It is up to local authorities to decide whether to carry out a rough sleeping count in the light of rough sleeping problems in their area.

In deciding whether or not there is a local rough sleeping problem that could usefully be measured via a street count, local authorities can gain intelligence from local outreach teams, the police, voluntary sector organisations and members of the public. They may wish to consider if there is evidence of rough sleeping in their area on a regular basis or if numbers appear to be increasing.

Where local authorities have decided to count, it is expected that counts will be undertaken using the guidance set out in this section. This will mean that count figures are more accurate and consistent and can reasonably be compared across regions, local authority areas and over time.

A count is a snapshot of the number of rough sleepers in any given area on a particular night and it will not therefore record everyone in the area with a history of rough sleeping. However it can be an effective means of gauging the scale of the problem and monitoring progress over time.

Given that rough sleepers often move between local authority areas (particularly in urban areas) it is strongly recommended that neighbouring authorities count on the same night whenever possible. This eliminates double counting and ensures that more mobile rough sleepers are not missed. Where more than one authority in a region or sub-region is planning to count, making arrangements to count regionally or sub-regionally is encouraged.

Final guidance will be issued in early September 2010. Formal rough sleeper counts should take place between 15 September and 30 November. Local authorities may choose to count more often than this but will only be required to submit the figure from their autumn count to CLG.

Planning

This document seeks to provide some basic good practice guidance around how to plan and undertake a rough sleeping count. The main focus is around ensuring local authorities are being broadly consistent in their approach, that anomalous or inaccurate results do not occur and that counts are safe for all concerned. More detailed guidance will be available on the Homeless Link website.

Points to consider for local authority leads organising street counts include:

- Scheduling – it is estimated that a rough sleeping count will take a minimum of six weeks to properly plan. This will give local authorities time to gather intelligence from partners, organise volunteers, plan the night's activities, liaise with the police and get a verifier in place.
- Gathering pre-count intelligence – the local authority may need to bring together a range of partners for a pre-count meeting to gather intelligence about where rough sleepers are likely to be located. This will help in planning where to look on the night and how many volunteer counters will be needed. Day centres, faith groups, outreach teams, local police, park staff, estate managers and members of the community will all have useful information on rough sleepers and where they might bed down.
- Choosing a night – given that the counts are a snapshot from a single night, it is important to try to avoid choosing a night when unusual local factors might distort numbers one way or the other (e.g. a festival or unusually high levels of police activity). Weekends might mean that beggars and street drinkers are out later than normal causing unnecessary confusion for counters.
- Agreeing the boundaries – it is not necessary to cover every street or park in any local authority area. With the limited resources likely to be available it is better to focus efforts on areas that rough sleepers are known to use. Producing clearly delineated maps for counters to use on the night is crucial to avoid double counting or missing key areas. It is also essential to plan ahead to gain access to non-public areas (e.g. hospital grounds, college grounds) on the night of the count if these are places where rough sleepers may be bedded down.
- Avoiding publicity – it is advisable to only share the date of the count with those that need to know and to ask them to be discreet. Publicity can worry some people sleeping rough and they may avoid their usual areas on the night if they know a count is taking place.
- Start and finish times – the earliest permitted start time is midnight but counts should start at 2.00am in cities and towns so as to ensure that rough sleepers who bed down later in these busier areas are still counted. Counts should be completed by 5.00am but may be conducted around dawn and extended to 7:00am in rural areas where the majority of people are sleeping rough away from built-up and well-lit areas. In most cases, if appropriate intelligence has been gathered and enough volunteers recruited, counts will take no more than two to three hours to conduct.
- Recruiting and briefing counters – many local authorities look for volunteers within their own workforce (with time off in lieu or overtime being awarded) as well as looking for volunteer counters from the local

voluntary sector or faith groups. All those involved in the count should be thoroughly briefed about how to keep themselves safe, about who to count and about how to record the details of anyone found rough sleeping.

- Organising a count verifier – so as to assure all involved that the count has been undertaken safely and in accordance with the guidance, arrangements have been put in place for counts to be independently verified. Local authorities needing to book a trained verifier for their count should email Homeless Link via – verifiers@homelesslink.org.uk – at least four weeks before the planned count date. CLG officials will not be routinely attending counts.

Who to count

In order to ensure a consistency of results, it is essential that those included in the count figure fall into the following definition:

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 barns, sheds, car parks, cars, derelict boats, stations, or “bashes”).

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

It does not include people who were rough sleeping in the area on a previous night or earlier in the evening but who were not there at the time of the count. It does not include people wandering around or empty sleeping sites.

Bedded down is taken to mean either lying down or sleeping. About to bed down includes those who are sitting in/on or near a sleeping bag or other bedding. The intention is to establish that they are or will be rough sleeping on the night of the count.

Research has found that in many areas people seen drinking in the street or begging (even if they have a blanket or a sleeping bag) are not necessarily sleeping rough and they should not be included unless they are clearly bedded down or about to bed down at the time of the count.

Safety

Local authorities have a responsibility to ensure that the safety of all those involved in undertaking a rough sleeping count is assured at all times. Counters should work in teams of at least two and have relevant equipment available to use (e.g. torches, phones). Care should be taken to ensure that an awareness of the whereabouts of counters is maintained at all times.

Local authorities should balance the need to keep all involved safe with the need to gather as much good information about rough sleepers as possible and must give clear local guidance to counters about whether or not to wake up any unknown/new rough sleepers found during the count in order to get information from them that might be helpful.

The safety of counters should be the overriding priority. If there are any areas in which they do not feel safe counting then they should be told not to enter.

Local police should be asked to assist with counts and are often willing to do so. Having police officers available on the night – even one or two – means that there are more options available around waking up unknown/new rough sleepers to get information from them that will help sort out their problems.

A 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. Arrangements should be made in advance for the safe transport home of counters, by taxi if necessary.

Counters should also be asked to carry identification and be given a letter from the local authority explaining their purpose in being out late at night.

On the night of the count, the relevant local authority officer should go through the safety procedures (e.g. when to call in, how to respond to emergencies, when to leave an area, how to deal with any aggression or anger from rough sleepers or others) carefully with counters and ensure that it is understood.

Recording

Local authorities will be asked to submit a single figure for the total number of rough sleepers counted, in early December of each year.

Estimating the number of rough sleepers

If a local authority chooses not to conduct a formal rough sleeper count, it should provide an annual estimate of rough sleeping numbers to CLG each year to help inform the national picture on rough sleeping.

It is important that the estimate, which should be a single figure (rather than a range of figures), is as robust as possible. The estimate relates to the number of people thought to be rough sleeping in any given local authority area on a typical night. Local authorities are asked to provide the estimate in relation to

the number of rough sleepers typically seen on any one night in a chosen week between 15 September and 30 November each year. Choosing this period (rather than winter or summer) means that the estimates provided will be in sync with the street count cycle and also means that the opening of winter shelters in many areas does not downwardly distort the figures.

In arriving at the estimate, it is suggested that local authorities give strong consideration to the following:

- Bringing together those local agencies that will have most accurate information about who is sleeping rough (e.g. outreach workers, police, faith groups, voluntary sector organisations and members of the community that have contact with rough sleepers on the streets) and getting their assistance in arriving at an estimate. Their differing knowledge, expertise and intelligence will ensure a wider range of reliable information on which to base the estimate.
- Ensuring that those who beg or street drink in any given area is not automatically counted within the estimate unless it is known that they are definitely also rough sleeping. This is important as research shows that most beggars and street drinkers are housed.
- Ensuring that those who use day centres/drop-ins and soup runs are not automatically counted within the estimate unless it is known that they are definitely rough sleeping. This is important as research shows that many of those using day centres/drop-ins and soup runs are housed.
- Ensuring that the figure provided relates to a typical night's rough sleeping numbers in the week in which the local authority has chosen to gather the estimate. This is very different from the total number of rough sleepers seen in an area over the previous month or year. Obviously rough sleepers move off and onto the streets at different points of the year and the estimate required is a snapshot rather than a cumulative figure.

This is outline guidance only. Homeless Link is producing a more detailed toolkit to support local authorities and their partners to accurately estimate rough sleeping numbers.

Once an authority has gathered the local intelligence to produce an estimate it may wish to seek agreement from those agencies who were involved in providing intelligence to inform the estimate as to the final figure to be submitted.

Contacts and Support

Further help and advice on conducting counts or providing estimates is available from CLG. In the first instance, please contact Jose Espineira on: jose.espineira@communities.gsi.gov.uk or 0303 44 43753:

Homeless Link's website – www.homelesslink.org.uk – also contains guidance and information that may be of use.

Appendix 2: The consultation criteria

This consultation has been conducted in conformance with the UK Government's Code of Practice on Consultation. The consultation criteria are:

1. When to consult: formal consultation should take place at a stage when there is scope to influence the policy outcome.
2. Duration of consultation exercises: consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible.
3. Clarity of scope and impact: consultation documents should be clear about the consultation process, what is being proposed, the scope to influence and the expected costs and benefits of the proposals.
4. Accessibility of consultation exercises: consultation exercises should be designed to be accessible to, and clearly targeted at, those people the exercise is intended to reach.
5. The burden of consultation: keeping the burden of consultation to a minimum is essential if consultations are to be effective and if consultees' buy-in to the process is to be obtained.
6. Responsiveness of consultation exercises: consultation responses should be analysed carefully and clear feedback should be provided to participants following the consultation.
7. Capacity to consult: officials running consultations should seek guidance in how to run an effective consultation exercise and share what they have learned from the experience.

Further details can be found in the *Code of Practice on Consultation* here: <http://www.bis.gov.uk/policies/better-regulation/consultation-guidance>

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