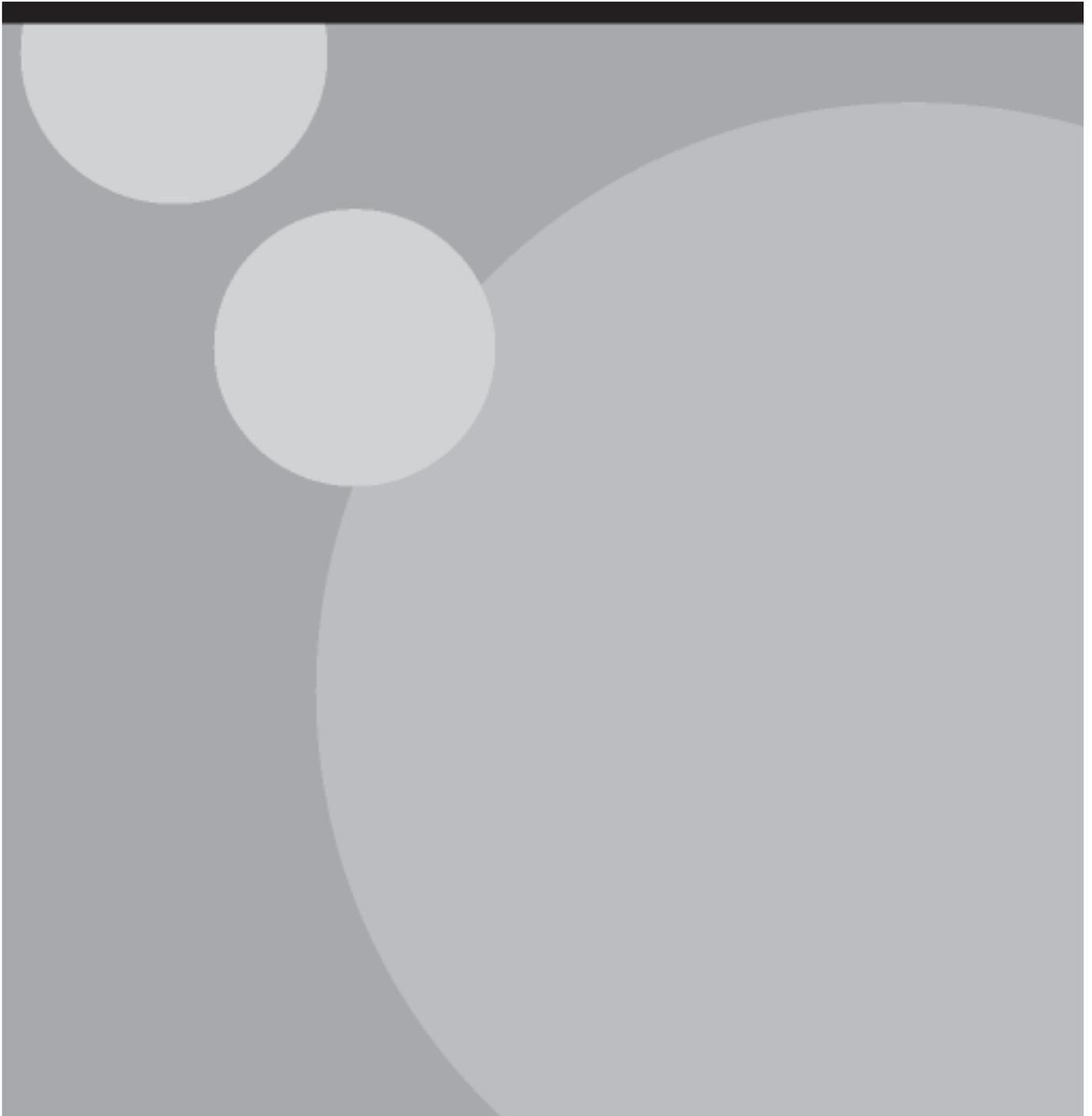




# Consultation on Proposed Changes to Guidance on Evaluating the Extent of Rough Sleeping

## Summary of responses



Department for Communities and Local Government  
Eland House  
Bressenden Place  
London  
SW1E 5DU  
Telephone: 0303 444 0000  
Website: [www.communities.gov.uk](http://www.communities.gov.uk)

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# Summary

Communities and Local Government (CLG) consulted on proposed changes to guidance on evaluating the extent of rough sleeping from 23 July to 3 September 2010.

Analysis of all of the submissions received from the consultation exercise indicated a broad level of support for the changes to the guidance. Therefore, we intend to adopt most of the proposed changes in the revised guidance to be issued on 14 September 2010, subject to a small number of modifications in response to issues raised during the consultation.

This new guidance sets out the new approach to producing rough sleeping counts and estimates from autumn 2010.

# 1. Background

Communities and Local Government (CLG) consulted on proposed changes to guidance on evaluating the extent of rough sleeping from 23 July to 3 September 2010.

The consultation was conducted according to the Code of Practice on Consultation. As a technical consultation on statistical outputs, it was open for six weeks rather than the formal 12-week public consultation period.

The six main changes proposed to the guidance were outlined in the consultation document and are repeated below.

1. **Conducting street counts is now 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 are no longer 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 section which offers local authorities some basic guidance on how to estimate numbers.
3. **The definition of rough sleeper has been expanded.** The definition of what constitutes being “bedded down” has changed to include rough sleepers about to bed down (e.g. sitting or standing near their bedding but not actually lying down). The definition now specifically includes people in tents (not on campsites or on organised protests).
4. The 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 **updates the recommended starting time for counts to 2am** 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.

A draft copy of the revised guidance was also provided in an appendix to the main consultation document.

Consultees were asked to comment specifically on the above proposals as well as on the content of the guidance in general and to provide suggestions on any additional measures that would improve the guidance.

This document summarises the responses received and the Government's response to these. Further details of the rationale for changing the existing guidance can be found in the consultation document.<sup>1</sup>

<sup>1</sup> [www.communities.gov.uk/publications/housing/evaluatingroughsleeping](http://www.communities.gov.uk/publications/housing/evaluatingroughsleeping)

## 2. Outcome of consultation

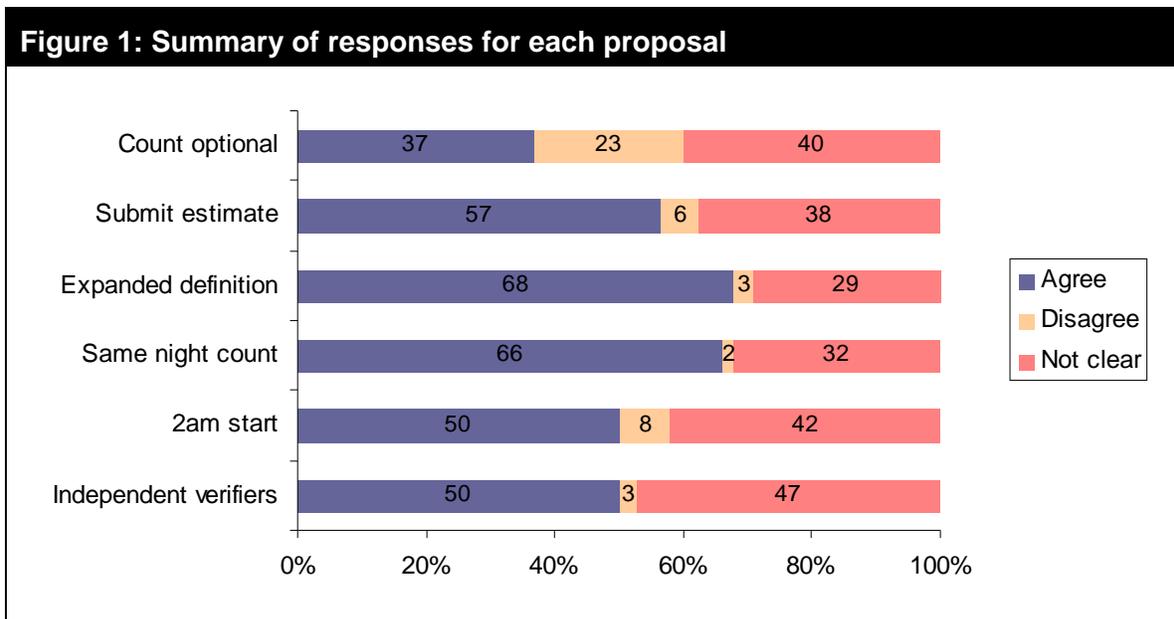
In total, 75 written responses were received from local authorities, voluntary sector organisations and other respondents. No respondent requested anonymity or confidentiality of response.

Type of organisation	No. of responses	% of total
Local Government	51	68%
Consultancy/research/other	5	7%
Voluntary organisation	19	25%
<b>Total</b>	<b>75</b>	<b>100%</b>

A full list of responding organisations is shown in Annex A. The majority of responses were from local authorities and the voluntary sector, reflecting the importance of their role in evaluating the extent of rough sleeping in local areas and providing support for individuals in need of assistance.

Some respondents provided views on each of the main proposed changes and others provided general feedback on the draft guidance.

The responses for the six main proposed changes to the guidance are summarised below.



Note: Not clear is where respondents presented a view on the proposal but it was not possible to clearly determine whether they were opposed to or in favour of the changes. Where respondents made no mention of a proposal they are not included.

On the basis of these figures there is little objection to most of the proposed changes with many more respondents agreeing than disagreeing with them. The exception is the question on a 2am start time for counts. This is discussed in more detail below.

There was a wealth of detail received in some of the responses which needs to be considered to provide a fuller picture of respondents' views on the proposed changes to the guidance.

Conducting a count to be a choice for individual local authorities and those authorities choosing not to conduct a count should provide an annual estimate (Proposals 1 & 2)

- Of the 75 respondents, 73 (97%) presented a view on proposal 1 and 72 (96%) presented a view on proposal 2.
- 37% of respondents responded positively to proposal 1 and 57% to proposal 2.
- 23% responded negatively to proposal 1 and 6% to proposal 2.
- Remaining consultation respondents who presented a view on this proposal provided comments but it was not possible to clearly determine whether they were opposed to or in favour of the changes.

The majority of local authority (LA) respondents welcomed the proposal to give LAs greater discretion to choose whether to conduct a rough sleeping count or to submit an estimate. Counts are seen by some authorities as burdensome and simply confirming rough sleeping information already held by outreach teams. However, many others still see value in continuing to count.

There was some concern raised by voluntary organisations that by giving local authorities discretion over whether to count or not, many may choose not to count and subsequently to assign lower priority to rough sleeping issues in their area. There was also a concern that estimates would not produce as accurate and consistent figures as counts and it was argued that there was a need for tighter guidance on circumstances in which an LA should be required to count.

These arguments were considered carefully by CLG. Despite the concerns raised, the view was taken that local authorities should be given the discretion to decide whether to use a count or an estimate to provide an assessment of levels of rough sleeping in their local area. This is consistent with CLG's commitment to localism and reducing central burdens on local government. Homeless link are producing supplementary guidance to help local authorities produce robust estimates.

Comments were also made on the importance of bringing mental health and substance misuse voluntary organisations more closely into count / estimate work by local authorities, as they have much local intelligence and common issues for rough sleepers. CLG agree that they should be involved and have amended the guidance accordingly.

### Expanded definition of a rough sleeper (Proposal 3)

- Of the 75 respondents, 66 (88%) presented a view on proposal 3.
- 68% of respondents responded positively to this proposal.
- 3% responded negatively to proposal 3
- Remaining consultation respondents who presented a view on this proposal provided comments but it was not possible to clearly determine whether they were opposed to or in favour of the changes.

The vast majority of respondents welcomed the proposal to expand the definition of a rough sleeper.

Some have argued that we should go even further, for example to include squatters and people in winter shelters. CLG carefully considered these arguments – however, on balance we have taken the view that this would move away from accurately measuring the levels of rough sleeping and would also present some difficult implementation challenges for local authorities. Respondents also suggested that stairwells are included within the definition – CLG agree with this suggestion and this is reflected in the final guidance.

### Neighbouring authorities to count on the same night (Proposal 4)

- Of the 75 respondents, 65 (87%) presented a view on proposal 4.
- 66% of respondents responded positively to this proposal.
- 2% responded negatively to proposal 4.
- Remaining consultation respondents who presented a view on this proposal provided comments but it was not possible to clearly determine whether they were opposed to or in favour of the changes.

The proposal that neighbouring authorities should count on the same night was welcomed by most respondents and as such this will appear in the new guidance.

### Recommend 2am start time for counts (Proposal 5)

- Of the 75 respondents, 64 (85%) presented a view on proposal 5.
- 50% of respondents responded positively to this proposal.
- 8% responded negatively to proposal 5.
- Remaining consultation respondents who presented a view on this proposal provided comments but it was not possible to clearly determine whether they were opposed to or in favour of the changes.

The proposal to move the earliest permitted count start time from midnight to 2am was welcomed by most respondents. However, there were some local authorities with which this proposal was not popular. Respondents argued that counts should reflect local circumstances and information from outreach teams, and should take place at the time when local knowledge indicates that the largest number of rough sleepers will be bedded down.

CLG agree that local authorities should be able to exercise their discretion to decide what time to start a count and have revised the guidance accordingly. We have also responded to concerns from respondents about the count period starting in September, by moving the count period so it runs from 1 October to 30 November.

### Homeless Link to provide independent verifiers (Proposal 6)

- Of the 75 respondents, 60 (80%) presented a view on proposal 6
- 50% of respondents responded positively to this proposal.
- 3% responded negatively to proposal 5.
- Remaining consultation respondents who presented a view on this proposal provided comments but it was not possible to clearly determine whether they were opposed to or in favour of the changes.

The proposal that Homeless Link provide independent verifiers for rough sleeper counts was welcomed by most respondents and as such this appears in the new guidance.

## Summary of responses: main changes proposed to guidance

On balance, CLG assess that the majority of respondents were positive about the proposed changes. The objections raised can largely be addressed and the new guidance on evaluating the extent of rough sleeping should adopt the changes as outlined above.

## Other comments received

The other comments received largely supported the Government's plans to improve the street count methodology and enable and assessment of the true scale of the rough sleeping problem.

One suggested less focus on counting rough sleepers and more resource put into agencies working together to assist those at risk or in need of assistance and there was support for continuation of preventions fund.

There were also a number of comments supporting use of more regular rough sleeping counts and counts during the summer months. On balance it was decided to not take these suggestions forward, although local authorities can choose to conduct more regular rough sleeping counts throughout the year if needed in their local area.

### 3. Next steps

The methodology changes outlined above have been adopted in the new guidance, issued by CLG on 14 September. This new guidance can be used by local authorities to carry out counts and estimates from autumn 2010.

In line with the requirements of the Code of Practice for Official Statistics the methodology and outputs of these statistics will be kept under review to ensure that they meet user needs. Any feedback on these statistics or this consultation outcome is welcome and should be made to Laurie Thompson.

[Laurie.thompson@communities.gsi.gov.uk](mailto:Laurie.thompson@communities.gsi.gov.uk)

0303 444 4131

# Annex A: List of respondents

Name of organisation	Type of organisation
1. Bournemouth BC	Local Government
2. West Oxfordshire District Council	Local Government
3. Basildon	Local Government
4. Birmingham CC	Local Government
5. Brighton	Local Government
6. Bristol	Local Government
7. Bury Council	Local Government
8. Camden LB	Local Government
9. Canterbury CC	Local Government
10. Cheshire	Local Government
11. Cornwall	Local Government
12. East Lindsey	Local Government
13. East Staffs BC	Local Government
14. Exeter	Local Government
15. Fylde BC	Local Government
16. Hillingdon LB	Local Government
17. Hyndburn Borough Council	Local Government
18. Islington	Local Government
19. Kensington and Chelsea	Local Government
20. Liverpool City Council	Local Government
21. Maidstone BC	Local Government
22. Manchester City Council	Local Government
23. Middlesbrough Council	Local Government
24. Newark and Sherwood DC	Local Government
25. North Devon	Local Government
26. North Lincolnshire Council	Local Government
27. North Tyneside	Local Government
28. Norwich CC	Local Government
29. NW Leicestershire	Local Government
30. Oxford County Council	Local Government
31. Redbridge Council	Local Government
32. Shropshire BC	Local Government
33. South Tyneside	Local Government
34. Southwark LB	Local Government
35. St Albans	Local Government
36. Stoke	Local Government
37. Sunderland	Local Government
38. Tameside BC	Local Government
39. Teignbridge	Local Government
40. Wakefield	Local Government
41. Wakefield	Local Government
42. Wellingborough BC	Local Government
43. Welwyn Hatfield Council	Local Government
44. West Midlands Homelessness Strategy Group	Local Government
45. Wigan	Local Government
46. Wiltshire	Local Government
47. Wirral Council	Local Government

48. Wirral Council	Local Government
49. Wirral Council (Housing Options)	Local Government
50. Wirral Council (Refocusing manager)	Local Government
51. York	Local Government
52. GLA	Other
53. Harvest Housing Group (Manchester)	Other
54. HQN Network	Other
55. LGA	Other
56. We Research It Ltd	Research organisation
57. Action for Children	Voluntary organisation
58. Brighter Futures	Voluntary organisation
59. Broadway	Voluntary organisation
60. CAN Housing Services	Voluntary organisation
61. Coventry Cyrenians	Voluntary organisation
62. CRI	Voluntary organisation
63. Crisis	Voluntary organisation
64. Drop in and share centre	Voluntary organisation
65. Homeless Link	Voluntary organisation
66. Hope NorthEast	Voluntary organisation
67. Housing Justice	Voluntary organisation
68. Maidstone Christian Care	Voluntary organisation
69. Pan London Providers Group	Voluntary organisation
70. Phoenix Futures (Wirral)	Voluntary organisation
71. Sheffield Cathedral	Voluntary organisation
72. Simon Community	Voluntary organisation
73. St Mungos	Voluntary organisation
74. Thames Reach	Voluntary organisation
75. The Passage	Voluntary organisation
76. Wirral Churches Ark Project	Voluntary organisation