



Crisis' response to the Communities and Local Government consultation: Proposed changes to guidance on evaluating the extent of rough sleeping

August 2010

Introduction

Crisis, the national charity for single homeless people, welcomes this consultation on reforming the way in which rough sleeping is counted. These counts are an important tool in assessing levels of street homelessness which remain a scandal in 21st century Britain. The counts also provide a way of ascertaining levels of support and services required in each area.

Whilst we welcome the recognition of the need to improve the way counts are conducted and support many of the proposed changes within the consultation, we are concerned that some of the proposals may actually hinder progress towards more accurate counts.

We are particularly concerned about allowing local authorities to choose whether or not to conduct counts as this could potentially set back all progress made by the other proposed changes. We also believe that CLG officials should continue to be present on counts.

In addition to the proposals mentioned below, we would like to see the introduction of decoys on counts as a way to ensure the counts' validity and that areas are being covered effectively.

Crisis believes that counts and estimates are important and that we should endeavour to make them as accurate as possible. However, it is important to note that they can only ever provide a snapshot of rough sleeping. If the Government really wants to tackle this issue effectively, longer term research and analysis is needed. Currently the only city that properly tracks the flow, stock and return of people sleeping rough is London, through the CHAIN database. Other cities should introduce similar systems to build up a more accurate understanding of rough sleeping. We would like to see this picture supplemented through further research and the use of other related data from services such as hostel populations, advice services and local authorities' housing options teams. Wider research into these areas will help to provide a more accurate and holistic picture of homelessness.

Response to proposed changes

1. Conducting street counts should be a choice for individual local authorities based on their assessment of whether the local rough sleeping problem justifies counting.

Crisis has real concerns about this proposal. With all local authorities facing tighter budget constraints, there is a danger that more will opt not to conduct counts and rely on estimates. While estimates are appropriate in some areas, Crisis believes that the current requirement of counting in areas where local authorities assess they have more than 10 rough sleepers should remain in place. Counts are vital in ensuring resources and services are targeted at the right areas and any gaps in provision are identified as quickly as possible. Removing the obligation to count in areas with significant levels of rough sleeping could result therefore in people not receiving the help and support required to move off the streets.

We also note from this year's figures that some councils are submitting estimates above 10 people but not counting, for example Arun estimated they had 25 rough sleepers in their area.¹ As is currently the case, all areas with more than 10 rough sleepers should be required to count rather than estimate. It is worrying that a significant number of local authorities are already not counting when estimates show they have more than 10 rough sleepers.

We are also unclear about the way in which such estimates are obtained in areas that have never counted and would like to see clearer information about how local authorities have arrived at these figures.

2. Local authorities should submit an estimate of the number of people rough sleeping on a typical night.

Crisis welcomes this proposal. As the 2010 estimates from local authorities who did not conduct counts shows, it is important that all areas submit a figure to give a much more accurate picture of the level of rough sleeping across England:

*'The combined total of estimates and counts of rough sleepers in England in 2010 was 1,247; this comprised 440 from the 70 authorities that conducted a count and 807 from the 256 authorities that provided estimates.'*²

We also welcome the provision of guidance on how to estimate these numbers but believe it is important that this guidance be developed through discussion with frontline service providers in order to produce the most clear and relevant advice possible.

3. The definition of what constitutes rough sleeping to be expanded.

Crisis welcomes the proposal to expand the rough sleeping definition as this will ensure more accurate figures are obtained. The current definition is extremely narrow, which is unhelpful for those counting and can lead to rough sleepers being missed from the figures. This leads to an inaccurate picture of the true extent of rough sleeping across the country and affects the way in which frontline services are delivered.

¹ <http://www.communities.gov.uk/publications/corporate/statistics/roughsleepingcount2010>

² <http://www.communities.gov.uk/publications/corporate/statistics/roughsleepingcount2010>

4. Neighbouring authorities should be encouraged to count on the same night.

Crisis supports the proposed guidance to encourage neighbouring authorities to count on the same night to ensure figures obtained give a truer picture of rough sleeping in each region. It is also important that in London and other metropolitan areas that ideally all boroughs or certainly the bulk of neighbouring boroughs count on the same night – as indeed happened last year in London. More coordinated counts will also help local authorities to understand the extent to which rough sleeping crosses borough boundaries and consider how best to share responsibility for those rough sleepers who sleep in more than one area.

5. The recommended starting time for counts to be updated to 2.00am.

Crisis recognises that rough sleepers, particularly in large cities, tend to bed down later in the evening and so we welcome the proposal to move the start time of counts to 2am. Whilst we don't want rough sleepers to be unnecessarily disturbed, it is also important to balance this with getting the most accurate information in order to provide the most targeted and relevant services and we believe later counts will help to do this.

6. CLG will no longer provide officials to attend and oversee counts.

Crisis is concerned about this proposal. We strongly believe CLG staff should still play a role in the counts. We believe that it is important to have buy-in from CLG as it helps the department to gain an accurate picture of the reality of rough sleeping from a frontline perspective, both from rough sleepers themselves and staff and volunteers who have expert knowledge and insight into the issues surrounding homelessness. This is helpful to all stakeholders in the process as it offers a real opportunity to share information between CLG and the voluntary sector, leading to improvements in funding opportunities, services and ultimately reducing levels of rough sleeping.

On a number of occasions Crisis staff including the Chief Executive and Director of Policy and External Affairs have verified counts. In general, it is positive for homelessness agencies to be involved however we have noted that it is not always clear how any concerns arising should be reported and followed up. We would like to see the role of Independent Verifiers clarified, especially the process for following up any concerns. This will be particularly important if CLG's role in the process is diminished.

Further recommendations

As mentioned in the introduction, Crisis would also like to see the use of decoys implemented on rough sleeping counts. People placed as decoys on each count could verify whether they are approached by volunteers and report back on the information requested from them. Alongside other reforms suggested above, decoys would really help to test the accuracy and extent of the counts.

Crisis has used similar techniques in the past to help improve standards of homelessness services. Our 2009 report, *'No one's priority: the treatment of single homeless people by local authority homelessness services'* used mystery shoppers to give an overview of what happens when single homeless people approach their local authorities for help and found the technique to be effective. We believe decoys on rough sleeper counts could similarly highlight further ways in which to improve the counts as well as build confidence in the process. Additionally, this would help gain buy in from individuals and organisations who may be sceptical about the counts. Not

only would decoys offer an extra checking mechanism but also an opportunity for people with concerns about the counts' validity to be directly involved by acting as decoys.

Conclusion

Rough sleeping counts have long been a source of debate, both in Government and amongst homelessness agencies. Given the direct impact these numbers can have on the provision of homelessness services, it is crucial to get them as accurate as possible and so Crisis welcomes any efforts to improve the way in which counts are conducted.

Whilst we welcome many of the proposals outlined in this consultation, we are concerned that some of them, such as removing the obligation to count in areas with more than 10 rough sleepers and no longer having CLG officials present at the counts will actually hinder rather than help the goal of improving the accuracy of rough sleeping figures.

We also believe it is crucial to see these counts as one tool in a portfolio of measures to gain an understanding of homelessness. Counts provide a snapshot of rough sleeping across the country and must be balanced with longer term, more in depth analysis into how people become homeless and whether the services provided are supporting them effectively.

Whilst we understand that in this tough economic climate both central Government and local authorities will be looking to make savings across their budgets, we feel it is important to bear in mind the huge financial impact that all homelessness and in particular rough sleeping has on many different areas of society. Spending money on accurate counts, in depth research and appropriate services now will save in the future and help to ensure rough sleeping is reduced to as close to zero as possible.



About Crisis

Crisis is the national charity for single homeless people. We are dedicated to ending homelessness by delivering life-changing services and campaigning for change.

For further information, please contact:

Katharine Sacks-Jones

Policy Manager

Crisis

66 Commercial Street

London E1 6LT

Tel: 020 7426 5668

Katharine.sacksjones@crisis.org.uk

Crisis

Company Number: 4024938 | Charity Numbers: England and Wales 1082947,
Scotland SC040094