
Director General for Regulation

Clive Betts MP
Chair, Housing Communities and Local Government Committee
House of Commons
London
SW1A 0AA

(by email)

08 May 2019

Dear Mr Betts,

I am contacting you about your Committee's evidence session held on 23 April 2019 to consider the *Homelessness Reduction Act - One Year On*¹. We are aware that some of our regulatory work into the Ministry for Housing, Communities and Local Government's (MHCLG) homelessness and rough sleeping statistics was discussed and we thought that providing an overview of our regulatory activity in this area may be helpful for your review.

You may be aware that the Office for Statistics Regulation (OSR) carried out an Assessment² of MHCLG's Statistics on Homelessness and Rough Sleeping in England in 2015. The assessment concluded that urgent actions needed to be taken for MHCLG's Statutory Homelessness statistics to retain its National Statistics designation. While the statistics had the potential to add great value for decision makers the presentation of the statistics, as three separate statistical reports with no coherent narrative to draw the statistics together, or to place them in context, it diminished this value. MHCLG made some quick improvements to provide a more complete picture of homelessness by bringing its Statutory Homelessness and Prevention and Relief statistics together and to improve its engagement with statistics users. These actions enabled MHCLG to continue publishing its Statutory Homelessness statistics as National Statistics until June 2018, when due to the introduction of the Homelessness Reduction Act and resultant changes to the data collection system, MHCLG requested³ the National Statistics designation be temporarily removed until such a time it was assured about the quality of the data from the new system. MHCLG has since published a set of new Experimental Statutory Homelessness official statistics based on the new data collection⁴.

MHCLG's separate rough sleeping statistics have never been designated National Statistics. The Secretary of State at the time of the assessment committed to improving them but acknowledged

¹ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/housing-communities-and-local-government-committee/homelessness-reduction-act-one-year-on/oral/100895.pdf>

² <https://www.statisticsauthority.gov.uk/publication/statistics-on-homelessness-and-rough-sleeping-in-england-department-for-communities-and-local-government/>

³ <https://www.statisticsauthority.gov.uk/correspondence/letter-from-sandra-tudor-to-ed-humpherson-regarding-changes-to-statutory-homelessness-statistics/>

⁴ <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-april-to-june-2018>

that they may never satisfy the requirements to achieve that status⁵. While there has been some limited progress, we are yet to see meaningful improvements to MHCLG's rough sleeping statistics.

In March 2019, we had cause to respond⁶ to concerns raised by John Healey MP on the quality of MHCLG's rough sleeping statistics. The latest official statistics showed a significant change between 2017 and 2018 in the way many local authorities had recorded rough sleeping, with many more authorities taking a street count or spotlight count approach than in recent years. This was particularly apparent for areas receiving additional funding under the Rough Sleeping Initiative (RSI). We concluded that more could have been done to acknowledge and explore this apparent methodological shift and its impact for the RSI areas, in particular in the published statistics. While we welcomed the expanded statistical narrative and quality information included in the latest statistics, greater clarity is still needed about what is driving this change in methods, the relationship to RSI funding, and the extent to which this may have affected comparability of the series. We also laid out our expectations for MHCLG to plan for better statistics on rough sleeping, and to publish those plans. MHCLG informed us of plans to publish an impact evaluation of the Rough Sleeping Initiative later this year which may improve understanding of the impacts of the methods changes in RSI areas.

We reiterated our views in a letter⁷ to Lord Bourne of Aberystwyth in April 2019, regarding statements he made during a Lords debate on rough sleeping. In that debate he stated that the number of rough sleepers in England had decreased by 19 per cent in RSI areas between 2017 and 2018, and that overall the number of rough sleepers was showing a downwards trend. While Lord Bourne had quoted the published statistics correctly, we believe MHCLG's latest rough sleeping statistics should not be used to draw firm conclusions about recent trends in rough sleeping nor the comparability of the series and cannot yet support public claims about the success of the Rough Sleeping Initiative. We aware that, during a subsequent Lords Debate⁸ on the 2 May 2019, Lord Bourne stood by his belief that the RSI funding was making a difference despite our previous letter, quoting differences between the rough sleeping numbers collected for Brighton and Hove between 2017 and 2018. Brighton and Hove is the RSI area that saw the most extreme fall in rough sleeper numbers (178 to 64) between 2017 and 2018, but which also changed its collection method from an estimate to a count between those years.

We were disappointed that during the Committee's evidence session on 23 April 2019, evidence given by the Minister for Housing and Homelessness, Heather Wheeler MP, and Jeremy Swain appeared to fail to appreciate our criticisms of the rough sleeping statistics, through their assertions about the statistics robustness and that they were comparing like with like. They did express a willingness to go through a process to reach a satisfactory outcome, however, we still await clarity about MHCLG plans to produce better statistics on rough sleeping, for it to publish those plans, and to provide clarity about the impact that the apparent change in rough sleeping methods used by some Local Authorities may have had on the comparability of the statistical series.

We also await confirmation that MHCLG is suitably assured about the quality of the new statutory homelessness data that it is collecting. As stated in our response⁹ to MHCLG's request to remove the designation of its statutory homelessness statistics in 2018, once they are assured of the quality

⁵ <https://www.statisticsauthority.gov.uk/wp-content/uploads/2016/05/Letter-from-Rt-Hon-Greg-Clark-to-Sir-Andrew-Dilnot-140416.pdf>

⁶ <https://www.statisticsauthority.gov.uk/correspondence/response-on-rough-sleeping-statistics-in-england/>

⁷ <https://www.statisticsauthority.gov.uk/correspondence/use-of-statistics-on-impact-of-rough-sleeping-initiative/>

⁸ <https://hansard.parliament.uk/Lords/2019-05-02/debates/8870B3E9-6CED-487E-9F34-C61CFAEA6431/HomelessnessLocalAuthoritySpending>

⁹ <https://www.statisticsauthority.gov.uk/correspondence/response-on-changes-to-statutory-homelessness-statistics/>

of the data, we intend in future to carry out a further review of the new statutory homelessness statistics alongside hopefully improved rough sleeping statistics. This approach is intended to allow us to consider the coherence of the newly developed suite of homelessness and rough sleeping statistics to ensure that they are sufficiently supporting society's needs for information in this important area.

We would very much appreciate it if these concerns could be shared with your Committee, and I would be happy to meet with you if you would like to discuss this matter further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Humpherson', written in a cursive style.

Ed Humpherson
Director General for Regulation