Welsh Government proposals to stop the national annual rough sleeper count in Wales

Summary
Given the availability of alternative data on rough sleepers, we are proposing to stop the national annual rough sleeper count in Wales. This count had been suspended since 2019. We welcome the views of our users (such as those in national and local government, academia, charities or as interested members of the public) on our proposals.

Background
From 2015 to 2019, the annual national rough sleeper exercise was carried out by local authorities, in partnership with other local agencies, to gauge the extent of rough sleeping across Wales.

Data was collected in two ways: a two-week information gathering exercise (usually undertaken during a period in October), followed by a one-night snapshot count in November. The results were published by Welsh Government (National rough sleeper count | GOV.WALES).

Rough sleeper count 2020 – 2023
The national rough sleeper count was initially suspended in 2020 due to the Covid pandemic, but was subsequently also suspended in 2021, 2022 and 2023.

Proposal to cease annual National rough sleeper count
Welsh Government proposes to cease requesting local authorities to undertake the annual rough sleeper exercise.

There are limitations to the annual rough sleeper count. It is inherently difficult to identify all people who sleep rough and to therefore include them in data collections when compared with people with more secure forms of accommodation.

The national rough sleeper count statistics provide a snapshot estimate of rough sleeping levels on a single night. The methodology provides robust, verified estimates but despite best efforts some people rough sleeping may be missed. Snapshots can be difficult to conduct and findings can be affected by external factors such as the weather, making comparisons over time difficult. Also, the individuals and number of people sleeping rough on one night will not be the same as on other nights.

Alternative source of rough sleeper information
Since August 2020, in addition to the collection and publication of annual data on statutory homelessness, local authorities in Wales have submitted monthly information which has been published by Welsh Government. Homelessness accommodation provision and rough sleeping | GOV.WALES. This includes the number of people placed in temporary accommodation and the number of people sleeping rough.

The rough sleeper estimates in the monthly collection are provided by local authorities and based on local intelligence at the end of the month, rather than a one night count between the hours of 10pm and 5am. The monthly data collection

ensures that timely and regular evidence on rough sleeping activity is available. Over time it will allow users to look at trends and see fluctuations within the year.

Due to the scope and content of this data being different to the rough sleeper count, we do not recommend comparisons between the rough sleeping estimates from the monthly collection and the annual rough sleeper count.

In recent months Welsh Government have worked with local authorities to improve the monthly data collection by strengthening the guidance provided to local authorities and publishing an expanded range of data, including at local authority level.

Future plans

Longer-term, Welsh Government are developing an individual-level homelessness data collection to replace our current aggregate statutory homelessness returns. While this will not initially contain data on rough sleeping, it will record detailed information on individuals and families who are homeless or threatened with homelessness, their passage through the Housing (Wales) Act 2014, and details of their temporary accommodation placements. Collecting more granular, linkable data will move us in-line with the approach taken in England and Scotland and facilitate more in-depth research to be conducted into homelessness, especially as a cross-cutting issue. This will greatly increase the quality and detail of information from which homelessness policies are made in Wales.

The Programme for Government makes a commitment to reform housing law and fundamentally reform homelessness services to focus on prevention and rapid rehousing. This is underpinned by Welsh Government's [Ending homelessness in Wales: a high level action plan 2021 to 2026 | GOV.WALES](#). In line with this Plan, the Welsh Government launched a consultation on a [White Paper on ending homelessness in Wales | GOV.WALES](#) on 10 October. Our longer-term strategy for individual-level data will enable us to obtain more granular data regarding a service user's journey through the homelessness system.

UK coherence and comparability
Homelessness policy is devolved across the UK and each country produces data and statistics on rough sleeping according to their own legislative framework. According to the ONS article [Rough sleeping in the UK - Office for National Statistics (ons.gov.uk)](#), the different approaches prevent direct comparison between each country's statistics. For rough sleeping statistics it says "it is often not advisable to directly compare across countries or data sources", and that it is "difficult to definitively report trends on rough sleeping for the UK as a whole".

Feedback

We want to hear what you think of this proposal, to allow us to continue to provide the statistics and analysis that matter most to you. Please let us know your thoughts

by providing responses to the following questions to stats.housing@gov.wales by the end of Friday 10 May.

Questions

1. Please indicate whether the proposal to cease the annual rough sleeper count will impact your work? (and if so, how).

Crisis is the national charity for people facing homelessness across Wales, Scotland and England.

We provide services directly to people experiencing homelessness, carry out research into the causes and consequences of homelessness, and campaign for the changes needed to end it.

We need accurate, reliable data in order to inform our research and develop the most effective policy solutions to end homelessness.

Street homelessness is the most acute and dangerous form of homelessness. Therefore, Crisis believes it is important to retain clear, accurate and regular information to encapsulate trends in rough sleeping across Wales to help inform policy developments and interventions.

We appreciate that the Welsh Government is developing systems for data collation and aiming to hold more detailed and granular data sets in the future, which is very much welcome. However, it is unclear as to when we will be able to expect clear and accurate data on rough sleeping across Wales. In the interim, we are concerned about the accuracy and reliability of the data on rough sleeping in Wales, and the negative impact this can have wider efforts to end homelessness in Wales.

Accurate data collation is important so that Welsh Government can hold local authorities accountable, observe national trends and monitor the effective implementation of policy.

In principle, we agree that monthly data would be preferrable to annual data as it provides our sector with more up to date figures and allows us to track the progress of policy changes more effectively. However, we have significant reservations about how robust the current system of monthly data collection is.

Guidance for local authorities submitting the monthly rough sleeping data reads:

"This is a snapshot of individuals sleeping rough on the last day of the month. Include only individuals sleeping rough on this night, not individuals who have been sleeping rough at other points in the month. Data should be based on local intelligence."

This description of a one-night snapshot appears to be at odds with the point made in this consultation: *"Snapshots can be difficult to conduct and findings can be affected by external factors such as the weather, making comparisons over time difficult. Also, the individuals and number of people sleeping rough on one night will not be the same as on other nights."*

Furthermore, it is unclear what "local intelligence" means in practice – this phrasing is open to interpretation. The lack of detail on methodology within this guidance is likely contributing to a failure to capture the true number of people sleeping rough in the community.

For example, we know that many people experiencing street homelessness may be engaged with third sector support rather than local authority services, or not be engaged with services at all. It is unclear within the guidance whether local authorities are expected to reach out to third sector partners in producing their estimates.

The vague nature of this guidance also means it is highly possible there is variation in the intelligence/data collection methods being employed by different local authorities, and within each local authority over time. This could also be resulting in misrepresentation of the true picture of rough sleeping across Wales.

This misrepresentation of the number of people rough sleeping in Wales could lead to inaccurate assessment of, or inability to assess, success of policy solutions designed to prevent and relieve rough sleeping, especially given that it is intended to be used as part of the Ending Homelessness Outcomes Framework. For example, the lack of accurate data will make it difficult to assess the success of the addition of street homelessness to priority need categories in 2022 and whether further intervention is needed.

Therefore, whilst we support the plans described above regarding the development of a new, individual-level homelessness data collection system, we have concerns about the withdrawal of the annual count in the meantime, especially if the monthly estimates are not to be strengthened.

To be clear, when we refer to the annual count, we refer to the two-week information gathering exercise as a whole, including the one-night snapshot count, rather than just the snapshot count alone.

We would suggest that this two-week exercise is conducted by all local authorities, and audited by the Welsh Government, as soon as possible. This would provide an accurate and reliable baseline measure for use as part of the Ending Homelessness Outcomes Framework.

The results of this exercise should also be compared to the monthly statistics collected within the same month to determine the level of variance between the two datasets and assess whether the monthly statistics are fit for purpose. Based on this, a final decision on whether to permanently suspend the annual

rough sleeper count could be made. If the annual count is to be permanently suspended, an explanation of the aforementioned levels of variance should be published.

Longer term analysis of trends is helpful. The publication of the monthly statistics currently advises against comparison of the monthly statistics with annual count data because of the different methodologies used. However, if permanently suspending the annual count, it would be useful to have guidance on how both data sources relate to each other.

If the annual count is permanently suspended, we would also expect guidance and training around the monthly data collection to be improved to ensure that the methodology is more consistent, there is more clarity about expectations around the gathering of local intelligence, and data is collected and recorded in a reliable way that is consistent across all local authorities.

2. **a) Please explain which statistics you use from the annual National Rough Sleeper Count for Wales**
   b) How do you use these statistics?

We use all the statistics included within the annual rough sleeper count to inform our policy development, as detailed above.

As a national campaigning charity, we use accurate data to show the scale of homelessness across Wales to increase public understanding of the issue and increase support for the solutions to address it. As the most visible form of homelessness, it is important to ensure there is accurate sources of data on trends.

We have been mindful in using the current monthly estimates that we cannot be confident that the data is robust, and this has impacted on our ability to use this data in the same way.

3. **Please indicate the impact of the suspension of the annual rough sleeper count between 2020 and 2024, and what alternative data sources you've used.**

Since the suspension of the annual rough sleeper count, we have been using the monthly statistics and the annual homelessness statistics. However, as indicated above, we are concerned that the monthly statistics are not reliable, so we have noted this when quoting the statistics and have been more cautious in how we use them.

We feel the inaccuracy also undermines the Welsh Government's ability to monitor implementation of policies and identify where further solutions may be needed. For example, as mentioned above, it is difficult to reliably assess the success of the addition of street homelessness to priority need categories in 2022.

In regard to alternative sources of data, our Homelessness Monitors, produced in partnership with the Institute for Social Policy, Housing and Equalities Research (I-SPHERE) at Heriot Watt University, use a variety of datasets to inform analysis.

The Homelessness Monitor Wales 2021 (p.62-63) lists the following datasets as sources: "...*administrative returns compiled by StatsWales, but also* from *DWP on temporary and supported accommodation, the latest Destitution in the UK Survey, a specially commissioned new representative panel survey (Public Voice) conducted by Kantar Public, a new suite of questions on 'Housing Difficulties' included in the Office for National Statistics (ONS) Survey of Living Conditions in 2018, and extended analyses of the UK Household Longitudinal Data Set (UKHLS, alias 'Understanding Society').*"

Whilst the Monitor provides a detailed snapshot of homelessness across Wales, it only takes place every other year. It is therefore important to retain detailed and accurate information in the interim.

In conclusion, Crisis values regular and accurate information on all forms of homelessness in Wales, including rough sleeping. The presence of such data is critical in efforts to end homelessness in Wales. We therefore welcome that the Welsh Government is looking to improve the granularity of datasets in the longer-term.

However, it will also be important to retain clear and accurate data in the interim – to inform the Welsh Government's new Ending Homelessness Outcomes Framework, assist in monitoring progress and help in assessing policy development. Whilst the annual count does hold limitations, we are concerned that the accuracy of the monthly estimates is not sufficiently robust.

To this end, we urge the Welsh Government to review how monthly estimates can be strengthened before moving forward with the permanent suspension of the annual count.

If you would like to discuss any of the points raised within this consultation in more detail, please contact Jasmine.Harris@crisis.org.uk.