
Director General for Regulation

Sandra Tudor
Head of Profession for Statistics, MHCLG
(by email)

4 October 2019

Dear Sandra,

Further to my previous correspondence in July¹ I am writing following the publication of the Ministry for Housing, Communities and Local Government's (MHCLG) Rough Sleeping Initiative (RSI) 2018 impact evaluation².

I welcome transparent presentation of the evaluation's methodology and its findings, which indicate that the RSI has had a statistically significant impact on reducing rough sleeping between 2017 and 2018. It is clear that the analysts involved have done a lot of good work to rigorously evaluate the RSI and their efforts to undertake this should be commended.

I would also like to thank MHCLG analysts for bringing the evaluation to the attention of my team and providing them with an overview of the findings. My team have identified some additional analyses that might be explored further. These include examining the possible effects of local authorities' changing their estimation approaches on the rough sleeping levels reported in earlier years and to explore relative, rather than absolute changes between RSI and comparator authority areas.

I recognise that the accurate estimation of rough sleeping in England is challenging and that while the snap-shot methodology is limited, it represents the most comprehensive approach currently available in England. Nevertheless, where further improvements can be made this is desirable. I therefore welcome Homeless Link's enhanced guidance³ for local authorities this year to help further ensure that the estimation approaches chosen in 2019 are those that will most accurately measure rough sleeping, regardless of other non-official approaches being used in RSI areas to collate RSI management information throughout the year.

I would also like to take the opportunity to recognise MHCLG's contribution to the GSS's recent work on UK homelessness⁴. This is important work providing valuable insights into the UK statistical picture on homelessness. I also look forward to MHCLG's separate RSI process evaluation later this year which will explore what has worked and why from the perspective of RSI local authorities. I encourage you to consider where findings from this work might be used to enhance the value of the annual rough sleeping statistics, the broader GSS work and how you might demonstrate that the principles of the Code of Practice can also apply to such analyses.

¹ <https://www.statisticsauthority.gov.uk/correspondence/comparability-of-rough-sleeping-statistics/>

² <https://www.gov.uk/government/publications/rough-sleeping-initiative-2018-impact-evaluation>

³ <https://www.homeless.org.uk/our-work/resources/counts-and-estimates-evaluating-extent-of-rough-sleeping>

⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/ukhomelessness/2005to2018>

In relation to the publication of further MHCLG analyses, we are aware that the way MHCLG summarised the RSI 2018 impact evaluation in some of its communications was not completely consistent with the underlying work. I encourage you to consider how you might reaffirm the importance of analysts having final sign off on such communications within the department to help ensure that confidence in important evidence isn't undermined once published.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ed Humpherson', with a stylized, flowing script.

Ed Humpherson

Director General for Regulation