

Assessment of compliance with the Code of  
Practice for Statistics

# Statistics on Statutory Homelessness in England

(produced by the Department for Levelling Up,  
Housing and Communities)

## Office for Statistics Regulation

We provide independent regulation of all official statistics produced in the UK. Statistics are an essential public asset. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards they must meet in the [Code of Practice for Statistics](#). We ensure that producers of government statistics uphold these standards by conducting assessments against the Code. Those which meet the standards are given National Statistics status, indicating that they meet the highest standards of trustworthiness, quality and value. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.

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# Executive Summary

## Judgement on National Statistics Status

- ES.1 Statistics on Statutory Homelessness in England are published by the Department for Levelling Up, Housing and Communities (DLUHC). DLUHC has published statistics on statutory homelessness since 1998, but they were substantially redeveloped following the introduction of the [Homelessness Reduction Act](#) (HRA) in 2017. The legislation has been reflected in an enhanced Homelessness Case Level Information Collection ([H-CLIC](#)) data specification for local authorities (LAs) to follow since April 2018, resulting in a detailed case-level data set, on which the statistics are based.
- ES.2 The introduction of the H-CLIC data requirement has considerably enhanced the potential of the statistics to answer key policy questions, through new insights on household flows through the homelessness system. DLUHC statisticians have developed new data dashboards to help communicate key insights, which are directly informing policy initiatives designed to reduce homelessness and its impacts. Plans to link H-CLIC case-level data with administrative and other sources, promise to enhance the value of the statistics further still.
- ES.3 However, the transition to the H-CLIC system has not gone smoothly for many LAs, some of which are still not able to return data against the new specification. DLUHC recently removed the old data submission method ([P1E](#)), to encourage all outstanding LAs to make the transition to H-CLIC, though this has so far led to an increase in the number of LAs not submitting data for key measures such as the number of households in temporary accommodation.
- ES.4 Despite these challenges, the statisticians have engaged positively with LAs to support them during the transition. They have developed methods to impute for LA data that are missing, or deemed to be of insufficient quality to publish, and a new dashboard to help communicate the quality of published LA data. However, ongoing LA data incompleteness and quality issues are limiting the overall public value of the statistics, and it is not clear how DLUHC plans to enable data linkage for those LAs not yet able to submit data to the H-CLIC specification.
- ES.5 The overall public value of the statistics could also be enhanced by the statisticians improving the overall accessibility of the statistics package, and the source data for further analysis, and providing clarity around the statistics' key insights and messages. DLUHC taking a more transparent and strategic approach to user engagement and its communication around future developments, as an ongoing way of working, would help realise the potential public value of the case-level data.
- ES.6 We have identified six actions for DLUHC to address to enhance the public value and quality of the Statutory Homelessness in England statistics and to achieve National Statistics status. These are described in chapters one and two of this report.
- ES.7 Once the statistics team demonstrates that these steps have been undertaken OSR will recommend that the UK Statistics Authority designate the statistics as National Statistics.

## Key Findings

### Public Value

- ES.8 The introduction of the H-CLIC data requirement has considerably enhanced the potential of DLUHC's statutory homelessness statistics to answer key policy questions, through new insights on households' progression through the homelessness system. These insights are directly informing policy initiatives designed to reduce homelessness and its impacts. For example, insights around homeless prison leavers being at increased risk of sleeping rough before making a statutory homelessness application are leading to policy efforts designed to help prison leavers find accommodation before their release.
- ES.9 Users highly value the statistics and welcome where value has been added through the additional commentary provided to aid interpretation during the COVID-19 pandemic, and the annual flows analysis, which showcases the potential of the case-level data. In terms of presentation, the overall statistics package is presented as a report on households at various stages of the HRA system and is not very accessible to non-expert users. Insufficient narrative is provided to explain what the statistics show. This means that the statistics are not easy to navigate, and it is difficult to determine their value in terms of the insights they offer, or the questions they help answer. The public value of the statistics would therefore be strengthened by improving accessibility to the statistics' key insights and messages. It would also help if the narrative placed the statutory homelessness statistics more clearly within the broader homelessness landscape.
- ES.10 DLUHC carried out a range of engagements as part of the H-CLIC development process, providing particular support to LAs to help them during the transition. More recently, the statisticians ran an online user event in May 2021 where they presented some of their planned developments. However, some users told us that they were not aware of the event or the development plans, which are not very prominent on the DLUHC website. Users told us that they would like a range of additional analyses and access to H-CLIC data for analysis. DLUHC should take a more transparent and strategic approach to user engagement and the communication of future developments, as an ongoing way of working. This would allow a broader range of users to feed in views on planned developments before they are introduced, and to help evaluate or make suggestions for further improvements once they are.
- ES.11 LAs also told us that H-CLIC is a much more burdensome data requirement than the previous P1E collection. However, the introduction of H-CLIC has increased the value of the statutory homelessness statistics and data and their potential to answer key questions. Plans to link H-CLIC case-level data with administrative health and benefits data and other sources, such as DLUHC's rough sleeper survey, promise to enhance the value of the statistics for policy making. To enable data linkage, DLUHC is setting up separate data sharing agreements with participating LAs to allow them to share personal data associated with individual cases submitted on H-CLIC. However, it is not clear how DLUHC plans to enable data linkage for LAs not yet submitting data to the H-CLIC specification. DLUHC told us that it is developing a new API (Application Programming Interface) collection method that has the potential to reduce burden on LAs once introduced.

## Quality

- ES.12 Users and data suppliers that we spoke to told us of the positive relationships they have with the statistics team at DLUHC, with the team also described as being helpful with any queries or issues and that the statisticians were timely in their responses. Users report that the quality of the statistics appears to have improved over the past few years since the introduction of the H-CLIC data collection. However, the switch from the previous P1E data collection to H-CLIC has not gone smoothly for some LAs, with some still unable to return H-CLIC data.
- ES.13 Some data suppliers and users we spoke to raised concerns around aspects of H-CLIC data quality, such as LAs that may not be recording their data on a consistent basis, or not asking certain sensitive questions, such as on gender identity and sexuality. Equally, applicants may not be comfortable supplying sensitive information. We also heard that housing options officers may prioritise collecting data essential to supporting a homeless application, with some fields, such as characteristics not related to priority need, being less likely to be completed accurately. This was particularly for cases where officers may have had only one interaction with an applicant, compared those where follow up interactions enabled the collection of further data. The statistics team told us that it is working to enable all LAs to return data through H-CLIC, and improve overall LA data quality.
- ES.14 Since our [previous assessment](#) in 2015, we have seen improvements in the supporting information made available to accompany the statistical release, for example the [Technical Note](#), which is published each quarter. We welcome some of the changes made to the latest technical notes. However, some of the value has been lost through the removal of other information from the most recent technical note, such as information on the comparability H-CLIC and P1E data. We recommend that the team uses the guidance set out in our [Quality Assurance of Administrative Data \(QAAD\) framework](#) to help determine its assurances around the extent of data quality issues, and to communicate these assurances to users.

## Trustworthiness

- ES.15 The statistics are released in an orderly way and are presented impartially and objectively. The statisticians maintain an up-to-date list of individuals granted pre-release access to the statistics in their final form ahead of publication and have a published revisions policy. The statistics team also has good relationships with the homelessness policy team within DLUHC, with briefing lines agreed between the teams to avoid potential misuse of the statistics.
- ES.16 The team told us that strong support is provided by the Head of Profession for Statistics at DLUHC, including in terms of training and resources. New starters attend Code of Practice Core Curriculum sessions and training on handling sensitive information appropriately. This assessment has not highlighted any concerns around the team's data governance practices.

## Next Steps

- ES.17 DLUHC should publish an action plan alongside the statistics on its website which sets out its proposals for addressing the assessment requirements. DLUHC is working towards having implemented the requirements in time for the next annual publication in Autumn 2022. We expect the DLUHC statistics team to report back to us after the publication of each quarterly bulletin, outlining the steps that it has

taken to address the requirements. The UK Statistics Authority will take advice from OSR based on the evidence received and decide whether to award the National Statistics designation.

# Chapter 1: Public Value

## Background to the statistics

- 1.1 DLUHC has published Statistics on Statutory Homelessness in England since 1998. The statistics are used extensively by government, local authorities (LAs), and charities and are also of interest to journalists, academic researchers, and members of the public. Uses of the statistics by DLUHC include monitoring levels of statutory homelessness across England to understand the scale and causes of homelessness and to consider possible policy responses; allocating resources and monitoring LA performance in relation to implementing the [Homelessness Reduction Act \(HRA\)](#) and to support bids for funding from HM Treasury. LAs use the data to plan services, allocate resources, monitor performance and benchmark against other authorities. Charities and academics also use the statistics to monitor and evaluate housing policy; campaigning; and for further analysis and reporting.
- 1.2 The statistics were substantially redeveloped following the introduction of the HRA in 2017, as explained in this [user note](#), which placed additional duties on English LAs to help prevent or relieve homelessness for anyone eligible for public funds. This is in addition to LAs' main homelessness duties to provide temporary accommodation to households that are considered by LAs to be eligible and in priority need.
- 1.3 The legislative changes have been reflected in an enhanced Homelessness Case Level Information Collection (H-CLIC) data specification for local authorities to follow since April 2018. Whereas the previous data collection (P1E) recorded cross-sectional totals on the number of households accepted as statutorily homeless each quarter, and the number of households in temporary accommodation, H-CLIC collects detailed case-level information on households each quarter, as they progress through each of the prevention, relief, and main duty decision stages of the statutory homelessness system.
- 1.4 This has resulted in a more detailed case-level data set on which DLUHC's current [statistics on Statutory Homelessness in England](#) are published each quarter, from the most recent reporting period (April-June 2021) back to April-June 2018. However, data on households in temporary accommodation is available on a consistent basis back to 1998. The statistics are accompanied by detailed LA tables and a [Technical Note](#) each quarter, with headline quarterly and annual time series available through separate [live tables](#). A separate [financial year annual report](#) which contains detailed flows analyses is published each Autumn. DLUHC statisticians have also recently developed new data dashboards to help illustrate key homelessness measures, on topics such as the [support needs of those owed HRA prevention or relief duties](#), and on [LA key performance measures and data quality](#).

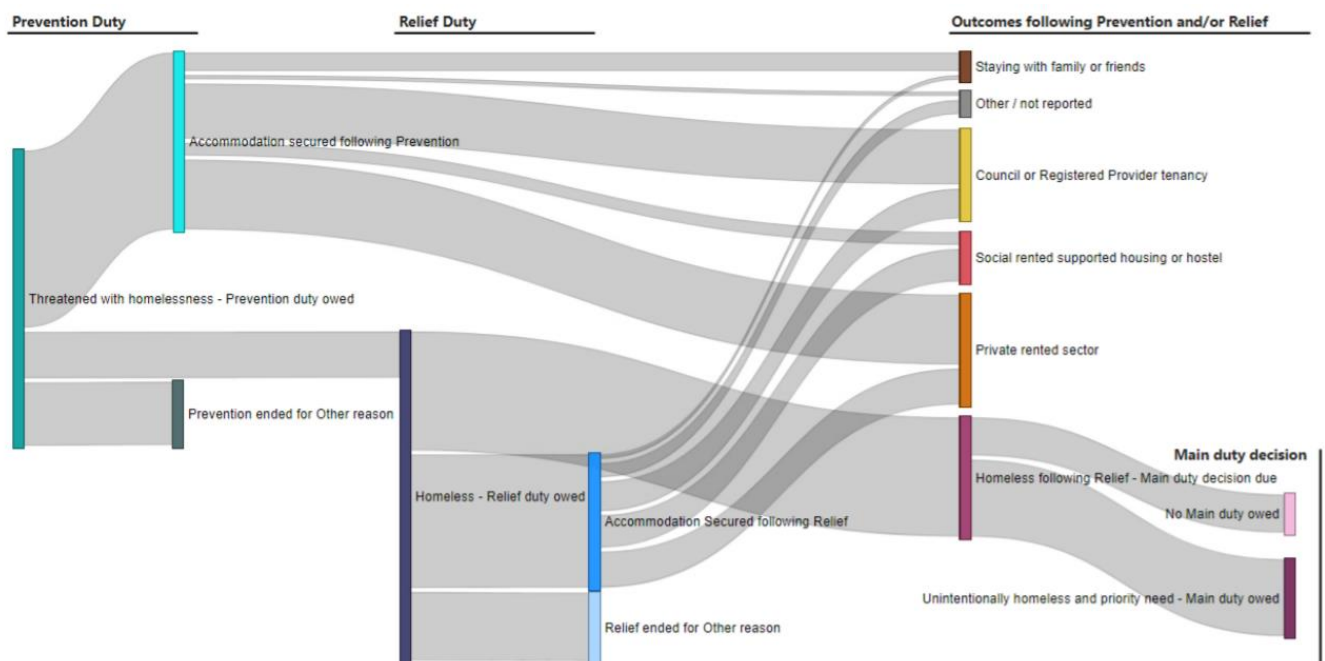
## Enhancing accessibility and clarity to achieve broader public value

- 1.5 Homelessness as a concept is often misunderstood and can be misused in public debate, with people often using the terms homeless and rough sleeper interchangeably. It is also not always clear how terms like statutory homelessness relate to others such as hidden homelessness, sofa surfing, or rough sleeping. The potential for this confusion makes it particularly important that the statistics are clear about their scope, the questions they answer, and what they include or exclude.



- 1.6 Users that we spoke to during the assessment recognise the value of DLUHC’s statutory homelessness statistics, seeing them as a reliable, consistent source for monitoring the statutory support available for homeless people in England. Users of the statistical bulletin told us that they appreciated the additional commentary that was added during the pandemic, to explain how the statistics collected during that period should be interpreted. The latest annual bulletin also includes links to ONS domestic violence analyses to provide broader context around increases in statutory homelessness related to domestic violence reported in the statistics.
- 1.7 Users told us that they particularly liked the new flows analysis at the end of the latest annual report, as this shows the potential of the H-CLIC data for answering key questions. The flows content is more accessible than that in earlier sections of the bulletin, though is situated at the end of the report as it is based on households granted prevention and relief duties in the previous year.

**Figure 1: Flow diagram of households assessed as owed prevention or relief duties in 2019/20, where case closed or received a main duty decision as of March 2021**



**Source:** DLUHC, [Statutory homelessness in England: financial year, 2020-21](#)

- 1.8 While the commentary around the flows analyses in the annual bulletin and additional commentary added during the COVID-19 pandemic is insightful, the overall messages earlier in the bulletin could be clearer and more accessible. The presentation of the statistics in the main part of the bulletin is primarily focused on reporting the caseload at different stages of the HRA system, rather than explaining the statistics’ main messages, or placing them in their broader homelessness context.
- 1.9 Both the quarterly and annual bulletins include a key points section. However, they are very long and while useful definitions for some key terms were provided in text boxes to aid interpretation, they appear to have been removed from [the latest quarterly bulletin](#) (April-June 2021). We note that some of the clearest, most accessible commentary is in the Technical Note. This means that it is not easy for non-experts to navigate or understand the statistics’ main messages, the insights

they offer, or the questions they help answer. The statisticians acknowledged that users would have to understand the HRA in order to navigate the statistics.

- 1.10 More generally, there is a lot of supporting documentation in different places, and on different webpages, so users may end up following links around and not finding the information they are looking for. For example, the statutory homelessness time series data are available only via a separate live tables page, and the Technical Note, statistical bulletin and live tables all point to each other for 'more information on data quality and limitations', which is confusing.
- 1.11 Some expert users told us that the fact that the statutory homelessness statistics don't capture all forms of homelessness could be clearer. These users see the statutory homelessness statistics as an important input into a broader measure of homelessness; as the statistics do not cover all homelessness, clearer guidance should be provided to help users place them within the broader homelessness picture. Users told us it would also be helpful for DLUHC to provide upfront advice in the bulletin about key strengths and limitations, how the statistics should and should not be used, or the questions that they can or cannot answer (such as in the similar approach developed for DLUHC's rough sleeping snapshot annual statistics).
- 1.12 Explaining coherence between different homelessness data sources is also important for setting the statistics in their proper context within a broader homelessness picture. DLUHC's [Homelessness statistics webpage](#) has potential to aid user navigation of the overall statistics package in an informed way and enable an understanding of where the statistics sit in the broader homelessness landscape.
- 1.13 However, the webpage contains a mixture of current and discontinued material, but using similar titles and with limited guidance for users on how to distinguish between the different outputs to find what they need. For example, differences between statistics on the previous (pre-HRA) and current statutory homelessness, and prevention and relief statistics; or the rough sleeping snapshot and separate management information on rough sleepers supported during the pandemic, are not clearly explained. And the homelessness notes and definitions pages linked from the homepage page relates to the old P1E data return, last updated in 2018. This makes it difficult to navigate to the most relevant data and guidance for particular uses.
- 1.14 Some expert users make use of the detailed data tables, rather than the bulletin. We heard positive comments that the table footnotes clearly reported the main caveats. One user commented that while the DLUHC glossary of terminology in the Technical Note is useful, it would help if these definitions were included in the data tables themselves.

**Requirement 1:** To ensure that the statistics are useful, easy to access and support understanding of important issues, DLUHC should improve the clarity of the statistics' main messages to help illustrate what the statistics show in terms of their value for answering key questions on homelessness, as well as their main strengths and limitations. DLUHC should also improve the accessibility of the current statistics package and website to aid navigation by a broader range of users, and so that the statistics can be appropriately accessed and interpreted.

## Engagement with homelessness statistics users

- 1.15 The new H-CLIC system's development was an innovation which drew on collaboration with a range of users and stakeholders. The redevelopment followed OSR's [2015 assessment of DLUHC's statutory homelessness statistics](#) based on the old P1E system, which identified a pool of users keen to contribute views on the improvements. DLUHC statisticians engaged broadly with these users while H-CLIC developed, and intensely with LAs as both users and data suppliers, to support them through the transition. LAs that we spoke to were very positive about the engagement that they have received from DLUHC statisticians.
- 1.16 While broader user engagement since the introduction of H-CLIC has been more limited, partly due to the pandemic, DLUHC carried out an online event with over 100 users and data suppliers in May 2021. This was advertised through a link on the gov.uk website alongside the statistical release, and promoted to existing contacts. The statisticians sent out a user survey in advance of this to ask for feedback on the statistics and the data collection (discussed further in the next section). However, some users that we spoke to were not aware of the event.
- 1.17 The statisticians told us they include an inbox email address on all homelessness statistics products so that users can reach out to them. The team told us that it evolves the statistics accordingly in response to user interest. The team also maintains a [user forum webpage](#) on the Government Statistical Service (GSS) website. The Technical Note states that "a website has been created to keep users up to date with all the latest developments in DLUHC's homelessness statistics. It contains details of user events and information about planned developments. Further information on the timescales or the consultation of user feedback will also be published on this forum." However, the user forum page primarily contains information for LA data suppliers, and there is no general information for users on this page, such as the user consultation event that was held in May 2021.
- 1.18 DLUHC statisticians told us that following the May 2021 online user event they are now thinking about more formal user engagements. They have a vision for GSS web forum pages and would like to have section on them about developments for users to directly feedback on. The statisticians told us that the GSS was currently revamping the web pages and reviewing old documents to make the pages and documents more accessible. However, they can start preparing documents to go on to that page once the GSS page is ready.
- 1.19 DLUHC has a [departmental user engagement strategy](#) with an annex on engaging with housing and homelessness statistics users, but this has not been updated since 2015. The statisticians told us that they were not aware of plans for updating the DLUHC departmental strategy, though their future engagement activities would link in with any overall departmental approach. The GSS published a [new user engagement strategy](#) in early 2021, to support departments in ensuring statistics meet society's needs, which we recommend DLUHC draws on.
- 1.20 The May 2021 online user event was a positive development, that was well attended. However, this kind of engagement appears to have been limited since the introduction of H-CLIC in 2018, and it's not clear what DLUHC's overall user engagement approach for the statistics is. However, broad and transparent engagement will be essential for informing the further development of the statistics to realise their public value; to inform users and manage their expectations; and to balance competing demands.

**Requirement 2:** To ensure that users' needs are fully understood, and their use of the statistics is supported, DLUHC should engage with a greater number and broader range of homelessness statistics users on an ongoing basis. DLUHC should review and update its user engagement strategy and set this out publicly, drawing on the updated GSS user engagement strategy. It would also be helpful for the team to update the GSS user forum web pages to include information of interest to a broad range of users of the statistics, beyond LA users.

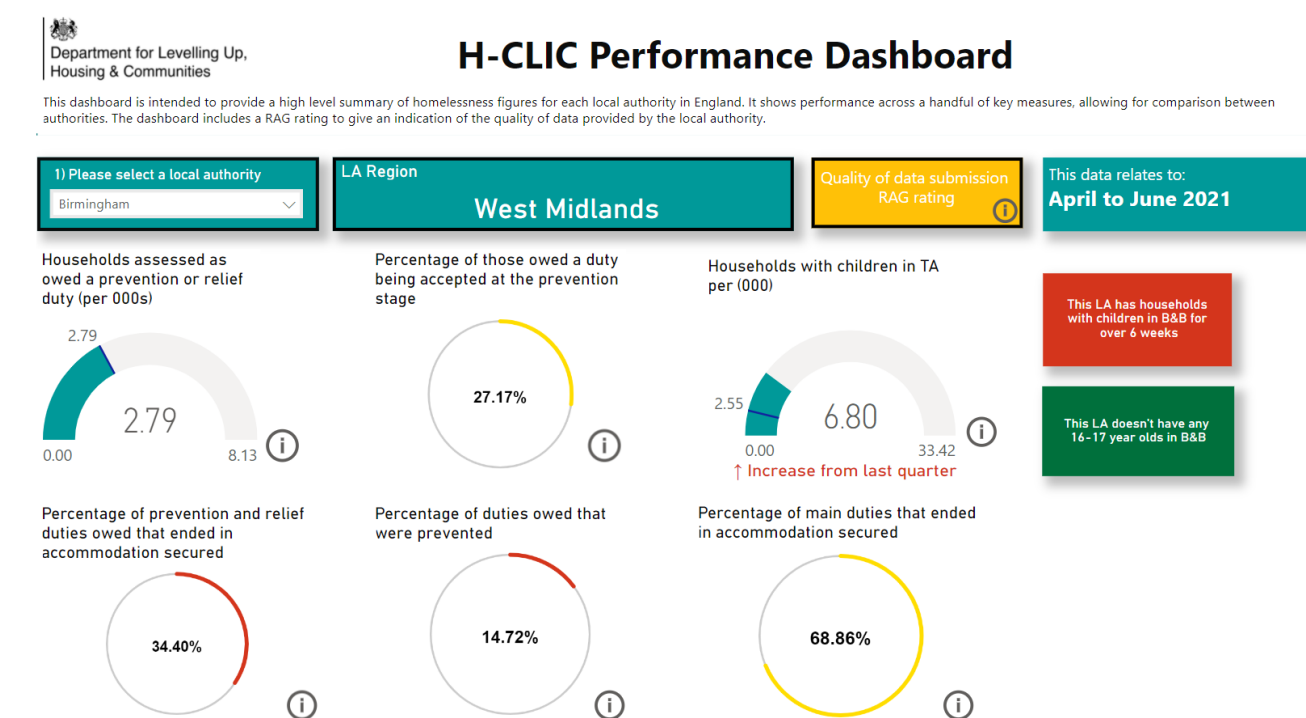
## Developments to enhance analyses and insight

- 1.21 Throughout the assessment it has become clear that while a lot of progress has been made by DLUHC statisticians throughout the redevelopment of the statistics, the full potential of the H-CLIC data has yet to be realised. Case-level data have potential to answer new questions of importance to society in terms of households' experiences, or flows through the homelessness system. DLUHC told us about a range of planned innovations, some of which are short-term improvements to outputs, while others are longer term developments to maximise value, such as through data linkage. Users also told us about the developments that they would like to see realised in future.
- 1.22 Ahead of DLUHC's user event in May 2021, the statisticians sent out a user survey asking for users' opinions on how the statistics might be further improved. Key [enhancements identified by the survey](#) included:
- Providing users with options to benchmark homelessness figures for some LAs against others, for example, being able to select more than one LA at a time, or simultaneously selecting different time periods to allow for more-detailed interrogation of the data
  - the ability for users to download the raw data and feed it into their own reporting tools
  - reducing the elapsed time between data collection and publication
  - making overall presentation more visual.
- 1.23 These areas also came up in our discussions with users. Some LA users told us that having the data published in standalone quarters in formatted tables made it tricky to produce time series to help benchmark between LAs. These users cited that they would like a large .csv raw data file (such as the data made available in a zip file alongside the Ministry of Justice's [mortgage and landlord possession statistics](#)) to enable such comparisons to be made between LAs over time using their own software. Some LA users also commented on a perceived long length of time between data submission and the statistics being published as being the reason why they rely more on their own internal reporting data for monitoring purposes and driving key decisions, than the published official statistics. Enabling timely comparative, time-series analyses between different LAs is therefore a key goal that would enhance the value of H-CLIC statistics for LA users in particular.
- 1.24 DLUHC's response to the user needs survey included a list of existing planned development projects, many of which would help address areas that users identified. However, the plans do not account for all the issues raised and it is not clear what the team plans to do about addressing the users' other concerns, such as those related to data submission. DLUHC told us that it is piloting a new

Application Programming Interface (API) method of extracting data from suppliers this autumn, with the aims of making the process more automated; reducing the time taken between data collection and publication; and reducing the data collection burden experienced by LAs.

- 1.25 In response to user interest in more visual and interactive content, DLUHC has begun introducing interactive data dashboards. These include on topics such as the [support needs of those owed HRA prevention or relief duties](#), and on [LA key performance measures and data quality](#), providing an indication of LAs that are more or less compliant with meeting HRA and the H-CLIC data requirements each quarter.
- 1.26 In terms of enabling benchmarking, the LA key performance measures, and data quality dashboard, presents the national average for England alongside the number of 'Households assessed as owed a prevention or relief duty (per 000)' and 'Households with children in temporary accommodation (per 000)' in individual LAs. However, there is not yet the capability in the dashboard for LAs to compare themselves with other individual, or groups of, LAs or the averages for their region, which LAs have expressed a clear interest in being able to do.

**Figure 2: Local Authority H-CLIC performance dashboard: key measures**



**Source:** DLUHC, [Statutory homelessness performance dashboard: April-June 2021](#)

- 1.27 In the case of one LA, the percentage of prevention and relief duties owed that ended in accommodation being secured, is reported as 119.35%. Where percentages are greater than 100 this would imply that more cases were closed during the quarter than were open. In cases such as this it should be explained clearly how this situation can arise, to avoid any potential confusion. We also found that the links to each dashboard could be more prominently located on their relevant webpages. At present there does not appear to be any mechanism to allow users to provide feedback on the dashboard, or any communication of whether

there are plans to further enhance the information provided within the dashboard, or its functionality.

- 1.28 The statistics team told us about several other planned developments including:
- Slimming down the quarterly bulletin from April-June 2021, to focus more on headlines and changes in trends from the last quarter, while extending the narrative, commentary and insight for the annual bulletin, each autumn
  - An ambition to have a dashboard drawing on all the current data tables where users can run their own analyses. However, it would be necessary to carefully manage the security of the data, as allowing people to take their own cuts of data would require case-level data to be made available, which could be disclosive. The statistics team had wanted to put out a flows dashboard along these lines to accompany this year's annual release, but had to restrict it to a pdf pack of the screenshots to protect confidentiality. DLUHC statisticians told us though that they are aiming to have this available for the next annual release
  - Facilitating the linking of H-CLIC data over time with information from other government departments as part of the [Homelessness Data England](#) project. This will improve the evidence base for homelessness and allow researchers and policy makers to analyse data that provides a multidimensional profile of people experiencing homelessness, in a secure setting
  - Timeliness – by programming in R and automating to improve processing times, the team has slimmed production times down to four weeks. The team is hoping the API project will improve this further and free up more time, which it can then use to help LAs still struggling with submitting H-CLIC data.
- 1.29 Some users we spoke to outside of government were not aware of DLUHC's development plans. They told us that they would welcome further engagement from DLUHC so they can feed in their ideas on the plans. Users have said that it would be good if DLUHC's development plans were more visible, rather than them hearing about them via word of mouth or after developments are launched.
- 1.30 Some other topics were raised by users during our engagement that users saw as within potential of the H-CLIC data collection. As previously mentioned, there were lots of requests from users to make the data more accessible and interrogable to aid further analysis. Some users are still raising Freedom of Information requests with LAs to get the homelessness data they require, which is an indication that they aren't getting everything they think is there from the statistics. Other user requests include:
- Users want more cross-tabulations and a further disaggregation of the published data, and preferably access to the microdata (anonymised) if possible, to allow for more-detailed analysis of characteristics
  - LAs would like to be able to make comparisons across larger urban areas, or second tier government (for example Greater Manchester)
  - Missing LA data means that some users can't carry out the analyses they would like to or present the data meaningfully in data dashboards. They acknowledge though that data completeness is improving over time, but see some LAs as consistently not reporting data every quarter. They acknowledge that missing LA data are clearly identified in the tables, but LAs are not labelled in the maps within the Technical Note

- H-CLIC originally promised to measure repeat homelessness cases but these estimates have still not been published
- In relation to temporary accommodation, users report that they are now no longer able to tell how long households have been in temporary accommodation, and they are unclear why these statistics are no longer available. They would also like to know the number of individuals in temporary accommodation, not just households
- Some users identify that not as much detail is available on the characteristics of households in the prevention and relief stages, compared to the main duty stage including: the number of children in the household; the number of age 16-24 presentations; and the characteristics of those ineligible for support or with no recourse to public funds, discounted at the eligibility stage
- Users would like to have more-detailed data to understand outcomes through the system by support needs and characteristics like ethnicity or disability
- Users also want more robust data in trans-homelessness, including more detail on gender identity categories (trans-male, trans-female, and non-binary)
- User would also like more information about the characteristics of households that fall out of the system at or between each duty stage – related to repeat homelessness
- Users would also like to see a further disaggregation of rough sleepers in H-CLIC by different support needs, and whether they slept rough in the last year, and not just at the homelessness application stage.

1.31 The statisticians told us that ineligible people fall out of scope of H-CLIC and so their characteristics are not recorded. In relation to measures of repeat homelessness, they said that they had been looking at what they could identify in H-CLIC to see the same people going through the system. They identified some possible issues with particular LAs not recording previous case data properly due to poor IT systems, but they were working these through. There was also a time lag involved when they are able to report complete flows, as some cases can take up to two years to go through the system.

1.32 The statisticians told us that meeting some user requests depended on other initiatives taking place first and that they were thinking about how best to communicate and update users on where they currently are with their planned developments. For things that users would like to see that the statisticians cannot do, or were out of scope, the team would consider adding more content explicitly on the limitations of the data. There is considerable potential for DLUHC to be more open about its future development plans and seek users' views in a transparent way to inform developments that add value, and to seek feedback on new products.

**Requirement 3:** To realise the public value of the statistics and support the information needs of a broad range of users, DLUHC should ensure that users have opportunities to contribute to development planning; are aware in advance of developments being launched; and have opportunities to contribute their views on new developments once published. DLUHC should be clear and transparent in its communications about which user requests for further developments it plans to address, and those it does not, and the rationale for its decisions.

## Enabling data linkage while limiting additional burden

- 1.33 H-CLIC is a powerful case-level dataset that has the potential to answer a range of questions, particularly of different households' experiences or flow through the homelessness system, and in understanding the nature and extent of repeat homelessness. While the data are available down to LA level, user feedback has highlighted a need for more-granular data. Users have also expressed a desire for the microdata and anonymised case level data to be made available for research purposes. There is a lot of potential to link H-CLIC data with other administrative sources to answer key questions, in greater granularity. But there is a need to balance increased insight with demands on LAs and applicants, particularly for LAs reporting that H-CLIC has substantially increased burden and those that have so far been unable to submit H-CLIC returns.
- 1.34 LAs reported that meeting the H-CLIC requirement increasingly takes over the focus of their engagement with homeless people. A two-hour assessment is required to collect all the data required, which is much more burdensome on homeless applicants and officers than the previous P1E collection. Many LAs have adapted but some are still struggling to get on top of the data requirement (discussed further in chapter 2).
- 1.35 The [evaluation of the implementation of the Homelessness Reduction Act](#) (March 2020) highlighted that LAs found transitioning to the new H-CLIC reporting requirements was a difficult process, especially when it was first introduced. LAs noted it was a significant challenge to meet the new data requirement and that with hindsight a different and later timeframe (to that of HRA) for the introduction of H-CLIC would have been better. The LAs in the case study all said that their existing IT systems were not fully equipped to meet the new data requirements and they had either modified, or in most cases purchased new systems – none described this as straightforward. DLUHC told us that the new API system being developed will be the key to reducing burden on LAs and to enable LAs to realise the benefits of being able to see more of the data themselves (for example, through a new quality dashboard).
- 1.36 Despite these challenges for some LAs, a range of ambitious linkage projects is planned through DLUHC working in collaboration with ADR UK and ONS on the [Homelessness Data England](#) project. Case-level data will sit on a research level platform where users can request access. The team told us that this was still a while away from becoming a reality as it needed data from other government departments too, but there would be a dataset that researchers can access securely through ADR UK.
- 1.37 DLUHC is currently looking to get data sharing agreements signed with participating LAs to allow them to share the personal data associated with cases submitted on H-CLIC. This will mean that DLUHC can create an ID spine to link H-CLIC data with administrative health and benefits data – this is currently being piloted with a small group of LAs. DLUHC told us it has separately held stakeholder events with LAs to explain its plans and continue to engage on a regular basis. The medium-term aim is to collect this personal data using the API so would require no input from LAs at all. It is not clear how DLUHC plans to enable data linkage for LAs not yet returning data via HCLIC.



# Chapter 2: Quality

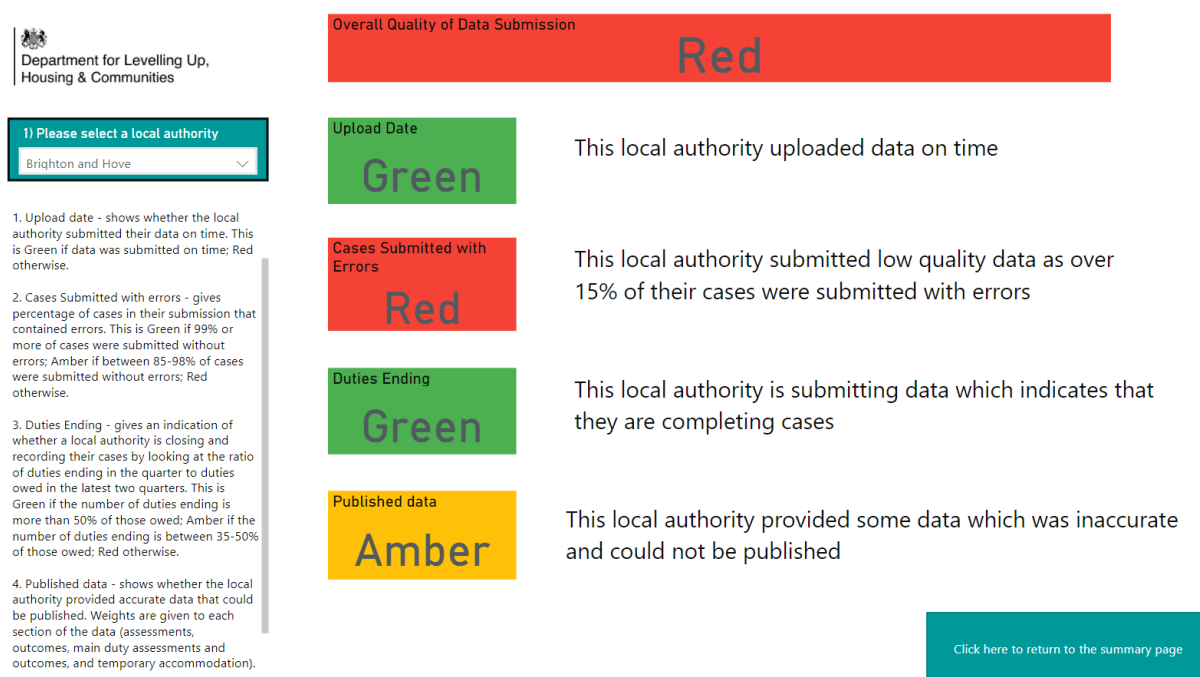
## Managing local authority data quality

- 2.1 LAs across England use a variety of different IT systems, each developed by different IT suppliers, to collect the data required for H-CLIC and submit to DLUHC via DLUHC's secure online data collection platform [DELTA](#). LAs have access to an instant case-level error report when they submit their data to DELTA allowing them to fix case-level issues before resubmitting. After submission, data are aggregated to LA level and a quality assurance report is sent back to each LA based on what they have submitted. The general view from users we spoke to is that data quality appears to have improved over the past few years since the introduction of the H-CLIC data collection.
- 2.2 LAs we spoke to across England as part of this assessment reported good relationships with the homelessness statistics team at DLUHC, and we heard from some LAs that prior to the pandemic, the DLUHC team had visited them in person. The statistics team was also described as being helpful with any queries or issues and that they were timely in their responses.
- 2.3 From our engagement with LAs we have seen a mixed picture in terms of some LA IT systems interacting with DELTA more smoothly, while some LAs are still struggling with their systems not being compatible with the H-CLIC collection and, up until the April-June 2021 quarter, were still submitting some of their data using the old P1E forms. We also heard from LAs that some had implemented the changes to their IT systems in readiness in 2018 while others did so much later, in part due to resources, and this has had an impact on the success of the transition from P1E to H-CLIC. Some LAs told us that these IT issues have also meant that they are unable to answer key questions internally around statutory homelessness. The LAs we spoke to that are still having difficulties with their IT systems and that do engage with the team at DLUHC, were positive about the contact and involvement that they have with them.
- 2.4 The old P1E collection should have ceased by April 2020 however due to the pandemic and the added pressure this put on LAs, the deadline was extended by a year. The latest Statutory Homelessness statistics release in October 2021 which covers the period April-June 2021 is based solely on H-CLIC data returns with some LAs still unable to return accurate data and in some cases unable to return any data at all.
- 2.5 The comparability between H-CLIC and P1E is covered in detail within the Technical Notes published up to the January-March 2021 quarter and we note that this information has not been included in the latest version of the Technical Note (for the April-June 2021 quarter). Useful guidance was provided on the comparability and differences in the data collection through P1E compared to H-CLIC, alongside helpful flow charts showing the journey through the homelessness system before (which used P1E) and after (which now uses H-CLIC) the introduction of the Homelessness Reduction Act. Users may not know to refer back to historic Technical Notes to find this information.
- 2.6 The January-March 2021 Technical Note states that "Around 3% of local authorities submitted aggregated temporary accommodation data through P1E only. Authorities with the largest temporary accommodation usage are significantly

represented among those reliant on P1E, which is why 18% of the national total in temporary accommodation continues to be provided on the pre-HRA collection system.” For consistency with information previously published it would be helpful to know for this latest quarter (April-June 2021), since the discontinuation of P1E, what percentage of the national total in temporary accommodation has now been imputed if those LAs who were previously reliant on P1E have been unable to return the data through H-CLIC. For transparency it is important to show what impact the stopping of P1E has had on LAs’ ability to return accurate data, and in turn on the level of imputation for the national totals.

- 2.7 We heard from some users that the reasons why some LAs cannot submit data are not made entirely clear. However, users did say they found it helpful that missing LAs were clearly marked in the published data tables.
- 2.8 We heard from the statisticians that there are mixed levels of engagement across LAs in England. There are some LAs that have not returned any data for previous quarters, or who have failed to return accurate data for several quarters. Users we spoke to were concerned that missing data could be skewing the overall homelessness picture for England, or that missing data in one LA meant that a complete picture was not available for a larger area. For example, one homeless charity we spoke to pointed out that data for one LA was missing from Greater Manchester’s [Homelessness Prevention Strategy](#). Another user we spoke to told us that they would like to create their own interactive LA dashboard but had been unable to do so due to LA data regularly missing.
- 2.9 The new [performance dashboard](#) released by DLUHC in October 2021 gives each LA an overall red, amber, or green indicator based on four quality measures (also each individually indicated as red, amber or green (RAG)): timeliness of uploading their data; what percentage of their cases were submitted without errors; whether the submitted data indicates that the LA is completing all of its cases; and whether the LA provided data that were accurate and had been published.

**Figure 3: Local Authority H-CLIC performance dashboard: data quality indicator**



**Source:** DLUHC, [Statutory homelessness performance dashboard: April-June 2021](#)

- 2.10 An explanation of the RAG marking for each of the four indicators is provided, with the overall quality RAG rating being determined by the lowest RAG rating of the four measures. In line with the Code, we would expect the statisticians to be transparent about the methods used to determine what the rationale is behind the cut off for each percentage to determine a red, amber, or green and which data sources are used for these, to help to ensure appropriate interpretation and use by statistics users.
- 2.11 The dashboard helps to identify which LAs are not returning accurate data, highlighting the issue of varying levels of data quality between LAs. The team told us that it will use the dashboard to prioritise which LAs to support in terms of the size of their caseload and relative impact on the statistics of them not returning data. However, they noted that many of the issues are system specific to LAs.

## Methods and dealing with missing data

- 2.12 LAs are given a minimum of six weeks to submit accurate data. For those LAs who have not reported accurate data or any data, these missing figures are imputed so that a representative figure at a national level is available. Where LAs have provided a missing or incomplete breakdown their previous submitted data are used to estimate the values using a multiplier based on the quarter-on-quarter change observed in groups of local authorities. The three groups used for imputation are London Boroughs; Unitary Authorities combined with Metropolitan Districts; and Shire Districts.
- 2.13 The team told us that it had engaged with the GSS Best Practice and Impact Division for help on making improvements to the imputation method, and any changes to the release are discussed in advance with the Housing sub-group of the [Central Local Information Partnership \(CLIP\)](#), allowing members, some of which are LA representatives, to provide feedback.
- 2.14 Some users expressed confusion about small differences between totals and summed columns as explanations around suppressions and imputation are not as clear as they could be. Similarly, where some categories are not mutually exclusive one user expressed that more clarity is needed on when you can and cannot expect columns to sum.
- 2.15 Some users and data suppliers we spoke to raised concerns that there may be LAs that are not recording their data on a consistent basis (for example demographic characteristics) and that some LAs may not be asking certain sensitive questions such as gender identity and sexuality, or there could be differences in the way support needs are recorded – for example only coding the main support needs rather than all that apply. Equally, applicants may not be comfortable supplying sensitive information about themselves. This could be leading to the overuse of the categories ‘other’ or ‘not known’ and affecting the robustness of the data sets.
- 2.16 Some LAs also shared with us concerns that barriers to submitting robust data included staff training where some local housing officers were struggling with the new H-CLIC questions compared to what was collected through P1E. Another possible barrier was where every data field must be completed before submission, some of the information input into some fields was questionable for example having to provide a National Insurance number when the applicant did not know what theirs was. Fields that aren’t essential to homelessness applications are likely to be of lower quality, and there is a risk this may also be the case for any additional data

collected. Extending the data currently collected to enable data linkage may also affect the amount of QA that the LA staff have to complete.

- 2.17 Public value from these statistics will only be maximised with returns from all LAs. In their efforts to engage LAs that are not returning accurate data and enable all LAs to return data through H-CLIC, we encourage the team to use the guidance set out in our [Quality Assurance of Administrative Data \(QAAD\) framework](#) to guide its understanding about the limitations of all stages of the data process, and to consider the level of assurance required, ensuring that its processes and those of its data suppliers, are appropriate. It is encouraging to hear from the statisticians that they are planning to use the QAAD toolkit to review data quality.

**Requirement 4:** To enable all LAs to return data through H-CLIC, and to help drive improvements in the quality of the data returned, DLUHC should:

- a) work with LAs that are unable to provide accurate H-CLIC data, including those not currently engaging with the team, to gain a better understanding of the specific barriers that they face, and overcome outstanding issues
- b) facilitate the sharing of best practice between LAs in terms of successful approaches to submitting data for those with similar IT systems, or those considering alternative systems, so that lessons can be shared more widely
- c) review its assurances around the quality of data collected from LAs, including variability in quality across different variables, informed by engagement with LAs about their data quality management approaches, and the practice areas within the QAAD toolkit
- d) publish a plan setting out its proposals and timelines for addressing a), b) and c).

## Communicating methods, quality, extent of revisions and uncertainty

- 2.18 Since our previous assessment in 2015 we have seen improvements in the supporting information made available to accompany the statistical release, for example the Technical Note, which is published each quarter. The Technical Note itself covers some useful information on areas such as the data collection, data quality, limitations of the data, how missing data are dealt with, the revisions process, and related statistics including comparability with the other UK countries' homelessness statistics. The Technical Note includes a link to DLUHC's wider [quality guidelines](#) in line with the European Statistical System's quality dimensions (Relevance, Accuracy and Reliability, Timeliness and Punctuality, Accessibility and Clarity, and Coherence and Comparability). However, these dimensions are not reflected in the Technical Note. No Technical Note is produced to support the annual publication, and so users of the annual publication could miss important supporting information.
- 2.19 The latest published Technical Note (for the April-June 2021 quarter) has some improvements including new information about the weighting method used. However, as mentioned in para 2.7 of this assessment report, some of the value has been lost by the removal of information and guidance on the temporary accommodation data such as the chart showing the percentage of the national total in temporary accommodation by submission method. The Technical Note also isn't clear on the level of data validation carried out at the LA level, which was a concern

raised by some users. Information about potential variability in data quality between LAs and across different data fields and any impacts for interpretation and use could be clearer.

**Requirement 5:** To enhance user understanding on the quality of the statistics, DLUHC should expand the published information on data quality, in line with broader quality measures covered in the DLUHC quality strategy, and its learning from applying the QAAD toolkit, to include:

- a) further information, in line with what was previously published on comparability between P1E and H-CLIC data, and the impact that removing P1E has had on data quality and the levels of imputation used, including on temporary accommodation figures
- b) clarity around any limitations or quality issues identified through further engagement with LAs and from applying the QAAD toolkit, and how these have, or will be, addressed or mitigated
- c) clear communication around the extent of uncertainty for different H-CLIC variables, and how these relate to the red, amber, and green dashboard quality indicators, to help to ensure appropriate interpretation and use.

2.20 The Technical Note provides information on the revisions policy covering scheduled and non-scheduled revisions and how these are dealt with. The document states that there are no scheduled revisions. However, the team told us that data are revised every quarter, and back across the previous year, at year end. Users we spoke to said it was not clear how far back revisions are made and whether there is any cut-off for when data are extracted from DELTA. Users expressed an interest in seeing the size and extent of revisions between the quarterly and annual releases to help them gauge the level of uncertainty in the data, for example through a published revisions table.

**Requirement 6:** To support users in the appropriate interpretation of the statistics, the team should provide:

- a) clarity on when revisions are counted as scheduled or non-scheduled in line with what happens in practice
- b) clear information on how far back revisions are made, and the nature and extent of revisions, for example by providing a revisions table.

# Chapter 3: Trustworthiness

## Independent and orderly statistics

- 3.1 Like many statistics producers who rely on data from LAs the covid pandemic affected data collections and so the Statutory Homelessness statistics along with other outputs from DLUHC were delayed. These delays were [announced](#) by the Head of Profession for statistics at DLUHC in May 2020. Since then, the team has been working to get the outputs back to being published to a more regular timetable in line with the pre-pandemic period. During our assessment we found that the statistics are released in an orderly way and are presented impartially and objectively.
- 3.2 All publications are pre-announced on the 'upcoming statistics release' page on the [gov.uk website](#) which is also signposted from the '[Statistics at DLUHC](#)' webpage. DLUHC has a dedicated section to [pre-release access to official statistics](#), in line with the [Pre-release Access to Official Statistics Order 2008](#) and which is kept up to date for each statistical release.
- 3.3 DLUHC's [revisions policy](#) on its website and further coverage in the Technical Note demonstrates transparency about its approach to scheduled and non-scheduled revisions. As already mentioned in section 2 above, the information on revisions provided in the Technical Note could be enhanced by providing further information on how the policy is applied in practice and being clear about the causes, size, and extent of revisions each quarter.

## Professional development and resources

- 3.4 The statisticians told us they have strong links with their Head of Profession for Statistics and felt well-supported by them in any decision making around the statistics. The team told us that new starters are encouraged to attend Code of Practice Core Curriculum sessions, and that new and existing staff are required to complete 'Responsible for Information' training annually which covers topics such as Protecting and sharing information and managing information as an asset. The team also receives guidance on the appropriate use of the statistics. The statistics team has good relationships with the policy team with policy briefing lines agreed between the teams to avoid any perceived misuse of the statistics.
- 3.5 The team told us that staff are well trained to cover each other's roles and that different members of the team have previously held teach ins for different processes for newer members of the team. At each production round, the team rotates roles where possible to allow members to lead on different parts of the process. They have handover notes, and guidance for the data collection and publication processes.
- 3.6 In terms of sharing resources and cross-collaboration across the department the team told us that they try to link up with other teams where possible so as not to duplicate work. The statistics team circulates a newsletter to policy colleagues and other areas to let them know what it is working on, which keeps teams informed of their work. The team also take many opportunities to present at other teams' meetings to ensure visibility and promote cross collaboration.

## Data governance

- 3.7 This assessment has not highlighted any concerns around DLUHC's data governance practices. Access to the data collection platform DELTA is strictly controlled via individual accounts, with guidance on appropriate use provided to DELTA users. DLUHC told us that it is establishing suitable processes to enable the sharing of personal data for data linkage. However, appropriate access arrangements may also need to be put in place to ensure the protection of personal data as the team move forward with their plans to make case-level data available for re-use, for example, in terms of ensuring safe and controlled access to either the detailed micro-data, or through an enhanced data dashboard.
- 3.8 This assessment has not identified any requirements relating to the trustworthiness of these statistics.

# Annex 1: The Assessment Process

- A1.1 This assessment was conducted from July to December 2021.
- A1.2 This report was prepared by the Office for Statistics Regulation and approved by the Regulation Committee on behalf of the Board of the UK Statistics Authority, based on the advice of the Director General for Regulation.
- A1.3 The assessment team – Oliver Fox-Tatum, Gemma Keane, and Michelle Alderson – agreed the scope of and timetable for this assessment with representatives of DLUHC in July 2021. Documentary evidence for the assessment was provided by the lead homelessness statistician at DLUHC in August 2021. The regulatory team met with DLUHC representatives in October 2021 and asked a number of exploratory questions as part of our review of compliance with the Code of Practice for Statistics, taking account of the evidence provided, user views and research performed.
- A1.4 A key part of the assessment was talking to people who use the statistics, to help us to understand the current value of the statistics, and where there is the potential to increase this. We approached known and potential users of these statistics and conducted 23 interviews. These users worked within DLUHC, the GSS, Local Authorities, homelessness charities, other organisations concerned with homelessness, academics, and other government departments in England, as well as the devolved nations. Our engagement gave us some insight into the extent to which the statistics meet different users' needs and to which users feel that the statistics' producers engage with them.



