



Homelessness and Rough Sleeping Sub Committee

Date: THURSDAY, 1 OCTOBER 2020

Time: 11.00 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

Randall Anderson, Chairman - Community and Children's Services	Natasha Maria Cabrera Lloyd-Owen, Community and Children's Services
Tijs Broeke, Police Committee	Alderman Bronek Masojada, Court of Common Council
Mary Durcan, Community and Children's Services Committee	Benjamin Murphy, Community and Children's Services
Helen Fentimen, Community and Children's Services Committee	William Pimlott, Community and Children's Services
Marianne Fredericks, Community and Children's Services	Henrika Priest, Community and Children's Services
Alderman Alison Gowman, Court of Common Council/Police Committee	Jillian Reid, Safer City Strategic Partnership
Alderman Vincent Keaveny, Court of Common Council	Ruby Sayed, Deputy Chairman - Community and Children's Services
Paul Kennedy, City Churches	

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Next Meeting Date: 1.45pm, Tuesday 1 December 2020

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:
<https://youtu.be/PXWDu85GYTY>

This meeting will be a virtual meeting and therefore will not take place in a physical location following regulations made under Section 78 of the Coronavirus Act 2020. A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

2. **MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT**

3. **ELECTION OF CHAIRMAN**

To elect a Chairman in accordance with Standing Order 29.

For Decision

4. **ELECTION OF DEPUTY CHAIRMAN**

To elect a Deputy Chairman in accordance with Standing Order 30.

For Decision

5. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 29 June 2020.

For Decision
(Pages 1 - 8)

6. **OUTSTANDING ACTIONS**

Report of the Town Clerk

For Information
(Pages 9 - 10)

7. **MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT AND THE CITY OF LONDON**

Senior Rough Sleeping Advisor, Rough Sleeping Delivery Team, Ministry of Housing, Communities and Local Government to be heard.

For Information

8. **ROUGH SLEEPER DATA - END OF YEAR 2019/20 AND Q1 2020/21**

Report of the Director of Community and Children's Services.

For Information
(Pages 11 - 30)

9. **CREDIBLE OFFER POLICY**

Report of the Director of Community and Children's Services

For Information
(Pages 31 - 46)

10. **COVID-19 RECOVERY PLAN UPDATE**

Report of the Director of Community and Children's Services.

For Information
(Pages 47 - 52)

11. **HOMELESSNESS AND ROUGH SLEEPING - GROWTH PROGRAMME UPDATE**

Report of the Director of Community and Children's Services.

For Information
(Pages 53 - 64)

12. **COMMUNITY PROTECTION NOTICES AND THE STREET POPULATION IN THE CITY OF LONDON (TO FOLLOW)**

Report of the Director of Community and Children's Services.

For Information

13. **CITY OF LONDON POLICE UPDATE**

a) Community Policing Model

b) Operation Luscombe

The Commissioner of the City of London Police to be heard.

For Information

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

16. **EXCLUSION OF THE PUBLIC**

MOTION – that, under Section 100(a) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act

For Decision

Part 2 - Non-Public Agenda

17. NON-PUBLIC MINUTES

To approve the non-public minutes of the meeting held on 29 June 2020.

For Decision
(Pages 65 - 66)

18. CITY OF LONDON POLICE NON-PUBLIC UPDATE

a) BEST PRACTICE APPROACHES

The Commissioner of the City of London Police to be heard.

For Information

19. QUESTIONS RELATING TO THE WORK OF THE SUB COMMITTEE WHILE THE PUBLIC ARE EXCLUDED

20. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT WHILST THE PUBLIC ARE EXCLUDED

HOMELESSNESS AND ROUGH SLEEPING SUB COMMITTEE

Monday, 29 June 2020

Minutes of the meeting streamed on You Tube at 1.45 pm

Present

Members:

Marianne Fredericks (Chairman)
Tijs Broeke (Deputy Chairman)
Randall Anderson
Mary Durcan
Alderman Vincent Keaveny
Natasha Maria Cabrera Lloyd-Owen

William Pimlott
Henrika Priest
Ruby Sayed
Reverend Paul Kennedy
David MacKintosh

Officers:

Simon Cribbens	- Community and Children's Services
Greg Knight	- Community and Children's Services
Chris Pelham	- Community and Children's Services
Kirsty Lowe	- Community and Children's Services
Will Norman	- Community and Children's Services
James Gibson	- Chamberlain's Department
Louise Said	- Chamberlain's Department
Bukola Soyombo	- Chamberlain's Department
Antoinette Duhaney	- Town Clerk's Department
Kerry Nicholls	- Town Clerk's Department
Julie Mayer	- Town Clerk's Department
Jillian Reid	- Town Clerk's Department
Chandni Tanna	- Town Clerk's Department (Communications)
Inspector John Peacock	- City of London Police

Also Present:

Deputy Brian Mooney - Chief Commoner

1. APOLOGIES

Apologies were received from Alderman Bronek Masojada and also from Henrika Priest for lateness.

The Chairman opened the first virtual meeting of the Homelessness and Rough Sleeping Sub Committee by thanking officers for their hard work during the lockdown. Their commitment had ensured that the City's street residents were not only accommodated but had been provided with the services they required and a pathway off of the streets.

Members noted that Chief Inspector Jesse Wynne had been promoted to the Control Room and his colleagues, Chief Inspector Chris Hay and Chief Inspector Ray Marskell, would be the Sub Committee's City of London Police representatives at future meetings. The Chairman and Members thanked Chief Inspector Wynne for his contribution to the work of the Sub Committee.

2. **MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT**

There were no declarations.

3. **MINUTES**

RESOLVED, that – the public minutes and non-public summary of the meeting held on 25th February 2020 be approved, subject to a correction in that Parkguard was not accredited under the Community Safety Accreditation Scheme within the City of London. Members noted that Parkguard held this accreditation in other areas which gave it a range of delegated powers under the Police Reform Act 2002.

Matters arising

The Chairman was pleased to advise that the capital bid had been approved at the March Court of Common Council.

4. **OUTSTANDING ACTIONS**

Members received the Sub Committee's outstanding actions list and noted the following updates:

- A government official would be invited to speak at the meeting of the Sub Committee on 1st October 2020 in respect of individuals without recourse to public funds.
- In respect of a proposal to publicise photographs of individuals who had received Criminal Behaviour Orders (CBOs), Members were assured that CBOs were a last resort, applied in response to persistent criminal behaviour. However, Members were concerned that this action might capture vulnerable people who were being exploited. A report outlining protocols on this matter would be provided to the Safer City Partnership, Police Authority Board and Homelessness and Rough Sleeping Sub Committee before any further action was taken in respect of publishing photographs.
- The Rough Sleeping Outreach Service Update report, which would be presented to the 24 July 2020 meeting of Community and Children's Services Committee, would also be circulated to those Members of the Homelessness and Rough Sleeping Sub Committee who are not also Members of the Community and Children's Services Committee. *[it was clarified following the meeting that the Stage 2 report for the Rough Sleeping Service would not be presented to the Community and Children's Services Committee; however, the report would be circulated to the Homelessness and Rough Sleeping Sub Committee when available].*
- The City of London Police update provided at item 8 today would be provided with the minutes to this meeting.

- A report on the Community Trigger process would be presented to a future meeting of the Sub Committee. The Head of Community Safety also agreed to compile the engagement undertaken with the '101' Service in respect of a case reported earlier in the year.
- All future press releases regarding homeless accommodation arrangements would be circulated to Committee Members. Members noted that they could ask the Media Team to include them in an email distribution list, alerting them to new press releases.

5. **HOMELESSNESS AND ROUGH SLEEPERS RECOVERY PLAN**

Members received a report of the Director of Community and Children's Services in respect of the Homelessness and Rough Sleeping Recovery Plan.

During the discussion and questions, the following points were noted:

- Officers gave an assurance that the recovery plan would include working with the Youth Hostel Association (YHA) and partners in mapping individuals' requirements, to ensure that accommodation pathways were in place well ahead of 31st March 2021.
- Members felt that this work was a 'watershed' in assisting homeless clients and the Assistant Director welcomed the ongoing support of the Sub Committee in driving the strategy. The Chairman felt that it had provided an excellent opportunity to gain as much intelligence as possible, which would enable Officers and Members to examine previous barriers and refusals to accept assistance.
- Action taken during lockdown had resulted in some very long-term rough sleepers accepting offers of accommodation. This had built trust and enabled them to have access to benefits, health checks, drug rehabilitation and other key services. However, it was essential to keep the momentum as there were ups and downs on these pathways.
- Support needs should extend beyond drug, alcohol and mental health rehabilitation and assist those with either a history of unsuccessful tenancies or living independently for the first time. Officers confirmed that work in this area was well-placed following the funding agreed by the Court of Common Council. Discussions were underway with neighbouring authorities to build on learning and to make new measures sustainable.
- In respect of providing facilities to the relatively low number of clients remaining on the street, Members were reminded that this would need careful management from a public health perspective and strict guidance was in place. Members noted that 7-8 outreach worker shifts operated every week and Streetlink was still the first point of contact for rough Sleeping concerns. Consideration would be given to how assessment and support could be offered most effectively in future, and the economic

impact of COVID-19 had the potential to increase the number of people who were homeless or rough sleeping.

RESOLVED, that – the report be noted.

6. **ROUGH SLEEPING COVID-19 SUMMARY REPORT**

Members received the Rough Sleeping COVID-19 Summary Report of the Director of Community and Children's Services. Members noted that the 'Doctors of the World' pilot had expired but multi-agency work was ongoing and it was hoped to resume the 'Doctors of the World' service.

RESOLVED, that – the report be noted.

7. **OUTREACH COMMISSIONING UPDATE**

The Director of Community and Children's Services provided an update on Outreach Commissioning. Members noted that this contract had not been awarded as planned in April 2020, as the resources of City services and potential providers had been fully engaged in responding to the COVID-19 Crisis. The process had since resumed and would be the subject of a report to the Procurement Sub Committee, seeking a delegated authority for a Stage 2 report which would be scrutinised at the Community and Children's Services Committee on 24 July 2020 in anticipation of a contract award in August 2020. The Chairman asked if those Members on the Sub Committee, who are not Members of the Community and Children's Services Committee, could be sighted on the report.

RESOLVED, that – the report be noted.

8. **CITY OF LONDON POLICE UPDATE**

During the Inspector's update, the following points were noted:

- Anti-social behaviour (ASB) had reduced considerably during the COVID-19 pandemic but was still being monitored.
- Government funding had been extended to the end of the calendar year in order to provide a dedicated PC and PCSO to work with the City of London Corporation's officers on rough sleeping, anti-social behaviour and begging.
- An action plan had been requested by the Chairman of the Safer City Partnership in respect of shared recording and information systems between the City of London Corporation and the City of London Police.
- A summary of the new structure for Community Policing was being designed under the force's Transform change programme and this included a focus on crime prevention and addressing local issues.
- Operation Luscombe had been suspended due to reduced staffing as a result of the COVID-19 pandemic but would re-start in due course.

- The Inspector had attended the Rough Sleepers Strategy Group meeting earlier today, led by the City of London Corporation. The work done in response to the 'Everyone in' announcement by the Government was very impressive and the government's commitment to extend the scheme beyond next month had been well received.

RESOLVED, that – the update be noted.

9. THE CITY OF LONDON COMMUNITY TRIGGER RECOMMENDATIONS JANUARY 2020: UPDATE ON ACTION PLAN REPORT

Members received a report of the Town Clerk, which updated Members on the progress in adopting and implementing recommendations developed during the January 2020 Community Trigger Review.

During the discussion on this item, the following points were noted:

- The '101' service was commissioned nationally and, whilst there had been some historic problems with the service, this had improved. Members were asked to contact the Head of Community Service if they became aware of any further issues. There was a concern expressed in that the public might perceive failings within the 101 service to fall within the remit of the City Corporation or other boroughs. The officer agreed to compile the engagement undertaken on this matter and provide Members with more detail.
- Whilst there was not a suite of policies in place, Community MARACs brought all partners together. This was often the first opportunity to share information and engage in a frank discussion about an appropriate course of action, on a case by case basis. It was noted that Community Behaviour Orders were a last resort; they were often framed as a supporting step and enforcement action did not always follow. Members asked the Community Protection Team to prepare a report on this matter, focusing on the mental health support aspects.

RESOLVED, that – the report be noted.

10. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

In response to two questions, the following points were noted:

1. Both lodges were running well and providing advice to residents on compliance with government guidelines. As the accommodation had no self-contained bathrooms, the services were treated as households under COVID-19 lockdown arrangements.
2. In respect of the consequences on vulnerable communities' post lockdown, officers were tracking data sets to identify pressure points; i.e. increases in housing benefit claims or approaches for advice on housing. Members noted that some industries, which might provide a first step back into employment for homeless clients, might be seriously affected.

11. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

The Town Clerk advised members that this was the last meeting of the Sub Committee for the current Municipal Year, with the Annual Meeting of the Court taking place in July and not April 2020. The Town Clerk would be writing to all Members shortly in respect of the annual appointments to Sub Committees. Members were reminded that the Homelessness and Rough Sleeping Sub Committee appointed from the wider Court, as well as from the Community and Children's Services Committee.

In concluding the public part of the agenda, the Chairman made the following tributes:

1. David MackIntosh, the Head of Community Safety, would be leaving the City Corporation after 19 years' service. David had provided a key role in providing support for drug rehabilitation as well as in the service area of Community Safety.
2. Since its inception in 2018, the Homelessness and Rough Sleeping Sub Committee's work had been ground-breaking, driven by the dedication of its Members and Officers. The Chairman has recently met a former long-term rough sleeper, who was now in much better health and in accommodation. This outcome evidenced how the work of the Sub Committee had been life changing for some extremely vulnerable people.
3. In turn, Members commended the Chairman for her dedication to the work of the Sub Committee.

12. EXCLUSION OF THE PUBLIC

RESOLVED– that, under Section 100(a) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item no	Para no
13	3
14	-
15	1,2 & 3
16	1&2

13. NON -PUBLIC MINUTES

RESOLVED, that – the non-public minutes of the meeting held on 25th February 2020 be approved.

14. QUESTIONS RELATING TO THE WORK OF THE SUB COMMITTEE WHILE THE PUBLIC ARE EXCLUDED

There were no questions

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT
WHILST THE PUBLIC ARE EXCLUDED**

Two matters were raised while the public were excluded.

16. **CONFIDENTIAL MINUTES**

RESOLVED, that – the confidential minutes of the meeting held on 25th February 2020 be approved.

The meeting closed at 3.26 pm

Chairman

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Homelessness and Rough Sleeping Sub Committee – Outstanding Actions

Action Number	Agenda Item	Action	Progress Update
4 December 2019			
-	Members asked if the British Transport Police could provide an update on their engagement and strategy re Operation Luscombe	The CoLP officer agreed to raise this at their next meeting and offered to provide Members with dates of Court Hearings, when possible.	Updates to be provided when available (CoLP).
25 February 2020			
1/20/HRS	Minutes	Report on how Brexit was likely to affect EU Nationals currently or at risk of being affected by homelessness and rough sleeping to be reported to the next meeting of the Sub-Committee on 21 April 2020.	To be considered at a future meeting.
2/20/HRS	Rough Sleepers Performance Report -Quarter 3	Ministry of Housing, Communities and Local Government's figures relating to homelessness and rough sleeping activity to be circulated to Committee Members when available.	To be provided when available.
3/20/HRS	Winter Programme Update Report	A report on the issues of individuals without recourse to public funds to be presented to a future meeting of the Sub-Committee. A Government official be approached to speak with the Sub-Committee on the issue of individuals without recourse to public funds	Completed - scheduled for the meeting on 1 October 2020. Completed - scheduled for the meeting on 1 October 2020.
4/20/HRS	Alternative Giving Campaign – Evaluation Report	An update on alternative giving to reported to the next meeting of the Homelessness Sub-Committee.	Completed

Action Number	Agenda Item	Action	Progress Update
5/20/HRS	Non-Public Questions	Confirmation to be provided as to whether plans to publicise photographs of individuals who were rough sleepers and who had Criminal Behaviour Orders had been progressed. (CoLP)	Report outlining protocol on this matter requested to be provided to Safer City Partnership, Police Authority Board and Homelessness and Rough Sleeping Sub-Committee before any action taken.
29 June 2020			
6/20/HRS	7. Outreach Commissioning Update.	Rough Sleeping Outreach Service Update - Briefing Note for consideration to be circulated to Committee Members.	Completed – Circulated to Committee Members on 17 July 2020 (Clerk)
7/20/HRS	8. City of London Police Update	Police update to be circulated to Committee Members.	Completed - Circulated to Committee Members (2 July 2020)
8/20/HRS	9. The City of London Community Trigger Recommendations January 2020: Update on Action Plan Report	Report outlining the Community Trigger process to be presented to a future meeting of the Sub-Committee, including details of the engagement undertaken with the '101' Service in respect of a case reported earlier in the year. (Community Safety Team)	To be added to work programme
9/20/HRS	15. Any Other Business (NP)	Press release regarding future homelessness accommodation arrangements to be circulated to Committee Members when available.	To be actioned when available (Media Officer)

Committee	Dated:
Homelessness Sub-Committee	01/10/2020
Subject: Rough Sleeper Data – End of Year 2019 /20 and Q1 2020/21	Public
Report of: Andrew Carter, Director of Community and Children’s Services	For Information
Report author: Raj Singh- Executive Support Assistant	

Summary

This report updates Members on the level and nature of rough sleeping activity within the City of London for the first quarter (Q1) of 2020/21- with information on the year 2019/20 for information. The full Rough Sleeping Performance Dashboard can be found at Appendix 1, with the headline figures below

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. The City of London Corporation is one of the top five London local authorities with high numbers of rough sleepers recorded during the year 2019/20. The number of people seen rough sleeping has remained relatively stable in recent years, albeit the number of those seen for the first time during the year 2019/20 had decreased from the previous year.
2. The total number of rough sleepers in the City of London was 172 in Q4 2019/20 but this number has fallen noticeably to 140 in Q1 2020/21. This figure is also considerably lower than that reported for the same quarter in 2019/20- 174. The number of rough sleepers seen during Q1 2020/21 in the City of London is below the number recorded in the previous quarter and is lower than that of benchmark local authorities. The City of London Corporation’s rate of decline is faster than most in the benchmark group.
3. The rough sleeper ‘flow’ (number of new rough sleepers to the street) has fallen from the previous quarter and remains relatively low in comparison to other benchmark groups. Overall, the decline in the rough sleeper flow annually is the amongst the fastest in comparison with London and benchmark groups.
4. In Q1, the proportion of new and stock rough sleepers in the City of London is below that of the London average and other benchmark local authorities. However, the proportion of intermittent returners is high (51%) in the City of London.

5. 63% of new rough sleepers in Q1 2020/21 did not spend a second night out with four joining the living on the streets population. This is below the 65% recorded in Q4 2019/20- with four rough sleepers migrating into the Living on the Streets cohort during the same period.
6. A total of nine people are now identified as most entrenched, RS205 clients,¹ and difficult to engage rough sleepers in the City of London. This is one more than the eight reported in previous quarter.
7. Mental health support is the most prevalent need for those seen rough sleeping in the City of London.
8. The number of rough sleepers seen during Q1 2020/21 in the City of London is below the number recorded in the previous quarter and is lower than that of benchmark local authorities. The City of London's rate of decline is faster than most in benchmark group.
9. Covid-19 has significantly impacted the number of Rough Sleepers being put in emergency accommodation, which would have skewed the number of those living on the streets. In Q4 2019/20, Covid-19 emergency accommodation stays went up from 26 (locally and pan London) to 121 in Q1 2020/21- a 365% rise.
10. There has been a significant fall (15%) in the proportion of the City of London rough sleeping population that are longer term rough sleepers, referred to as being stock or returning clients.
11. There has been a considerable rise in the proportion of intermittent rough sleepers in the City (13%) in Q1 2020/21, compared to Q4 2019/20.
12. Thirteen (28%) of the 46 new rough sleepers spent more than one night out or were not seen rough sleeping again in the period. And a total of four of the new rough sleepers joined the 'living on the streets' cohort.
13. 185 individuals were provided with accommodation stays during 2019/20 and 9 where helped with reconnections with their local areas or countries. In Q1 2020/21, 101 people were provided with accommodation stays but none were helped with reconnection with their home area. This is forty two more than the 59 helped in the previous quarter of which 2 were helped with reconnections in Q4 2019/20.

Implications

14. The prevention and relief of rough sleeping in the City of London links directly to the 2018/23 corporate plan, particularly the aim of contributing to a flourishing society.
15. There are no direct financial or legal implications associated with this report.

¹ RS205 (rough sleepers 205) clients are identified as the most entrenched and prolific and hard-to-help rough sleepers

Health Implications

16. There are no direct health implications associated with this report. The service however continues to support rough sleepers with their health needs.

Conclusion

17. This report has summarised key data on rough sleeping in the City of London in Quarter 1 2020/21 with comparisons to 2019/20, which is detailed in full in the dashboard.

Appendices

- Appendix 1 – Q1 Rough Sleeping Dashboard (Final)

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Executive Support Assistant

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**CITY
OF
LONDON**

COL 2020-21 City of London Rough Sleeping Report RSSG

- Performance Team
- E: ellie.ward@cityoflondon.gov.uk

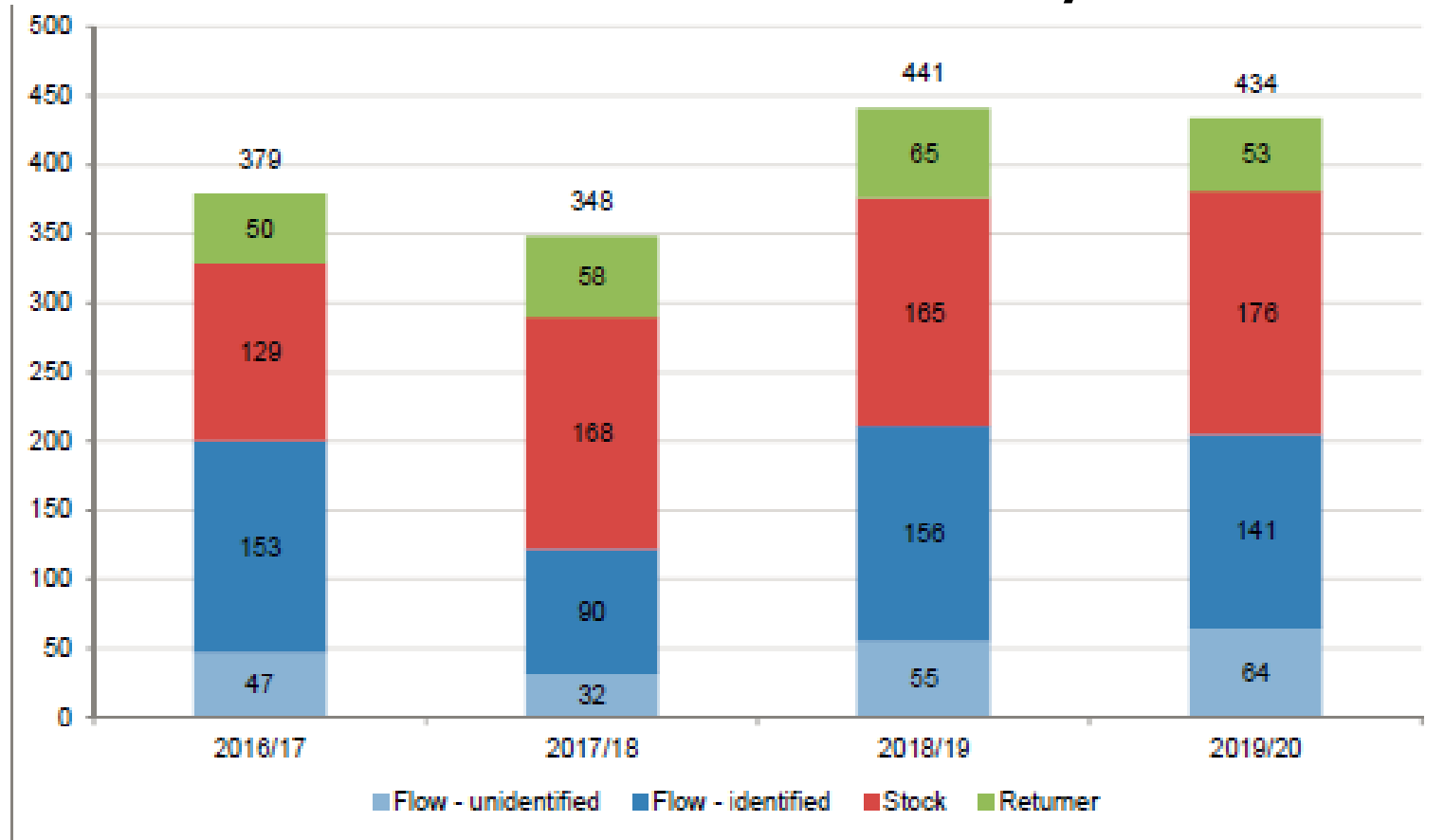
- This report updates Members on the level and nature of homelessness and rough sleeping activity within the City of London for the first quarter (Q1) of 2020/21- with information on the year 2019/20.
- For the purpose of this report, the definitions of the three categories of rough sleepers considered are described in below:

New rough sleepers (Flow)	Those who had not been contacted by outreach teams and identified as rough sleeping before the period.
Living on the streets (Stock)	Those who have had a high number of contacts over three weeks or more, which suggests that they are living on the streets.
Intermittent rough sleepers (Returners)	People who were seen rough sleeping at some point before the period began, and who were contacted in the period – but not seen regularly enough to be ‘living on the streets’.

Annual Trend of Rough Sleepers in the City

Annual rough sleepers	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	DOT-change from previous
Total rough sleepers	373	440	379	348	441	434	↔
Flow (New)	168	225	200	122	211	205	↓
Stock (longer term)	149	158	129	168	165	176	↑
Returner (Intermittent)	56	57	50	58	65	53	↓

Flow, Stock and Returner Breakdown 2019/20



2016/17 base: 379
 2017/18 base: 348
 2018/19 base: 441
 2019/20 base: 434

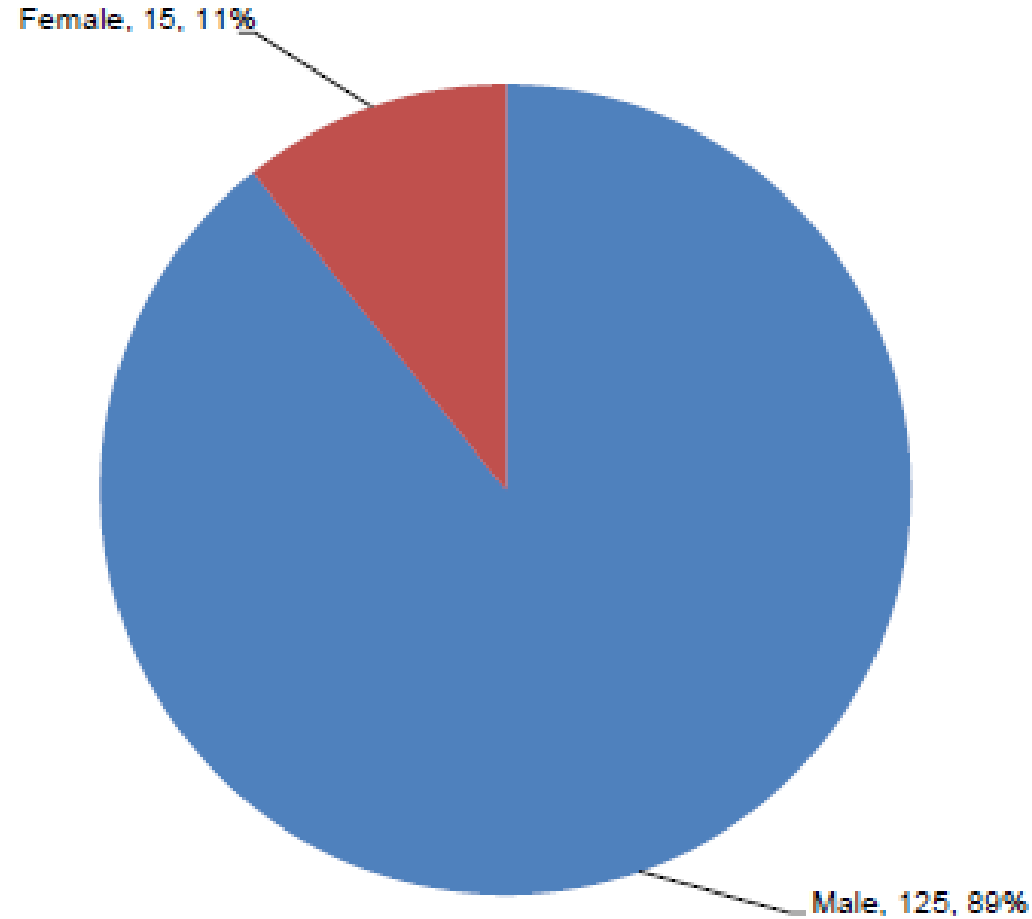
Number of rough sleepers – comparing quarterly trends

	2019/20				2020/21	% change from previous quarter
Local Authority	Q1	Q2	Q3	Q4	Q1	
City of London	174	181	145	172	140	-19%
Southwark	142	195	201	197	221	12.00%
Tower Hamlets	137	190	127	137	155	13.00%
Camden	183	265	235	242	239	1.00%
Westminster	888	1097	768	834	710	-15.00%
Greater London	3172	3985	3637	3692	4227	14.49%

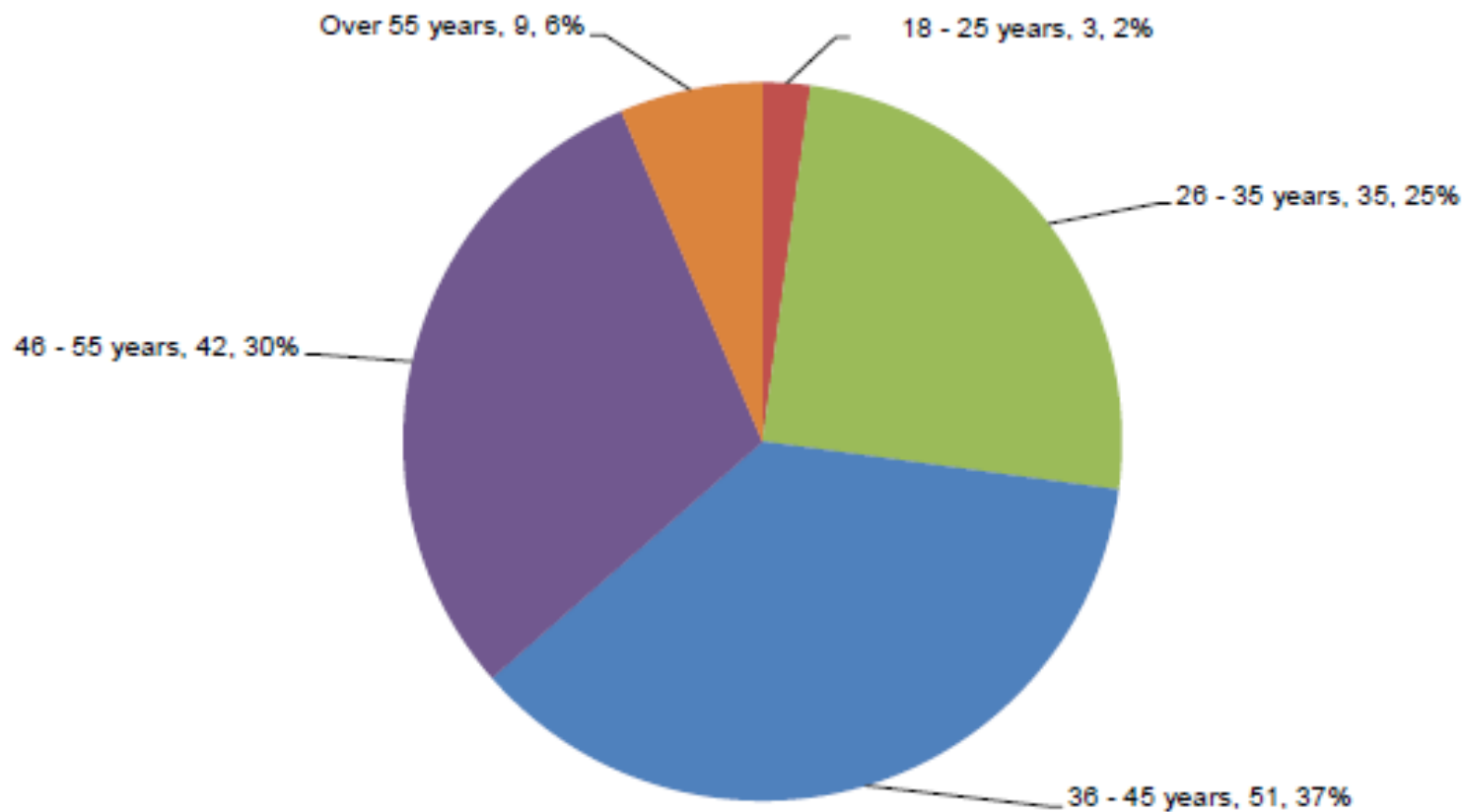
Composition of rough sleepers in Q1 2020/21

	New rough sleepers	New Rough Sleepers - Joined LOS	Intermittent Rough Sleepers (returner)	Living on the Streets (All) Longer Term	LOS - RS205+ (entrenched)	Total
City of London	46	4	71	27	9	140
Southwark	114	7	81	33	5	221
Tower Hamlets	78	1	67	11	2	155
Camden	128	6	98	19	3	239
Westminster	353	10	297	70	12	710
Greater London	2680	39	1322	264	44	4227

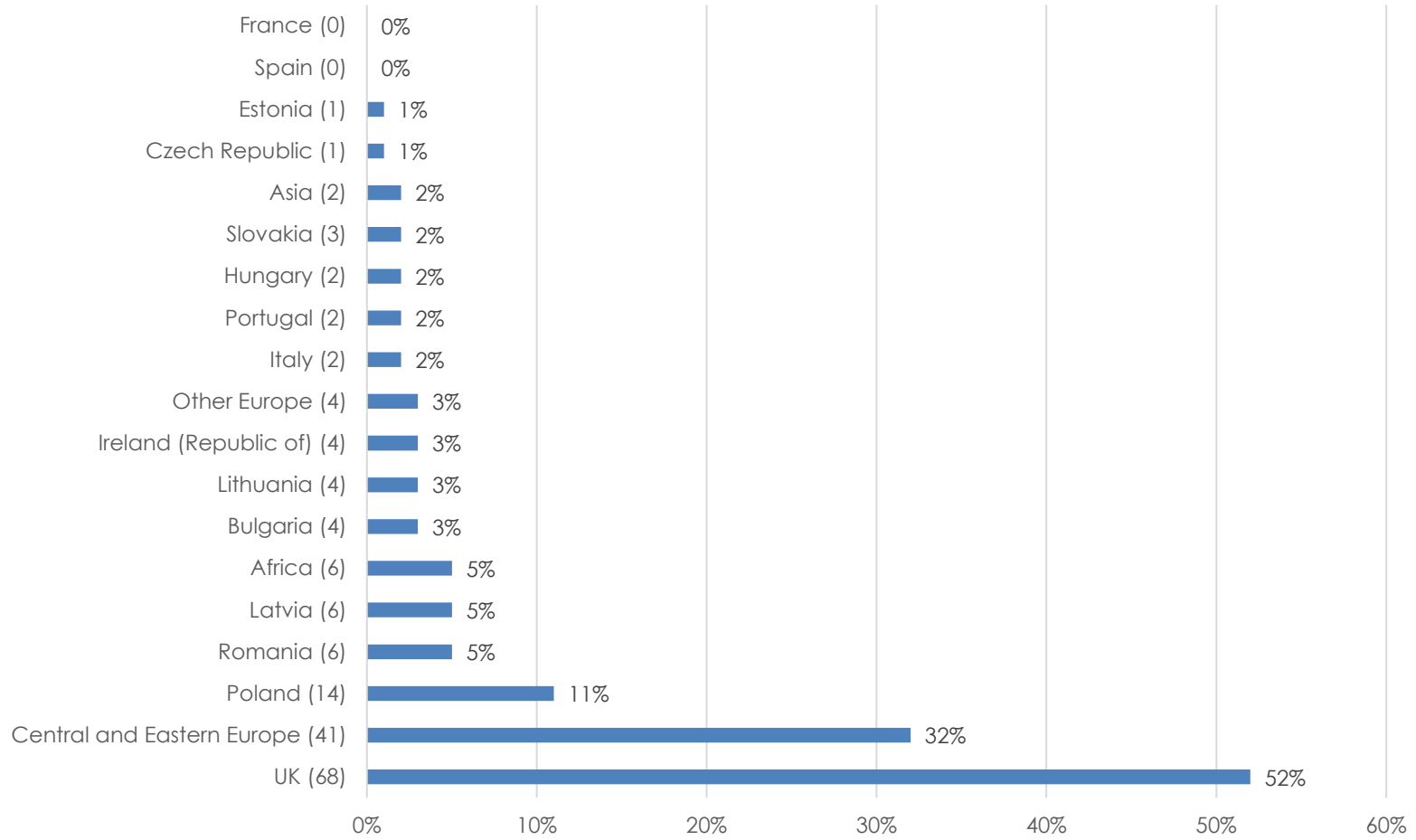
Gender- Q1 2020/21



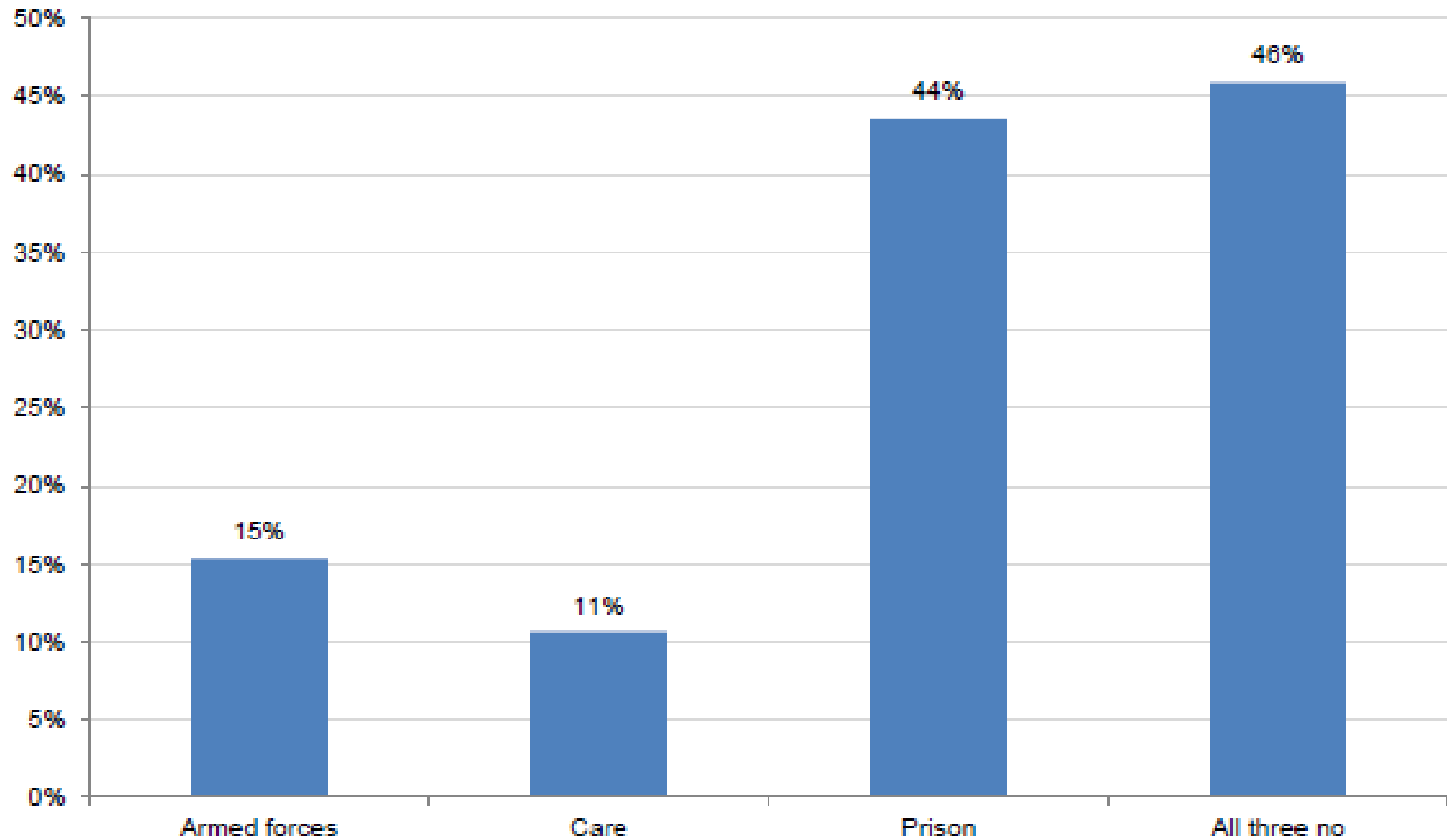
Age- Q1 2020/21



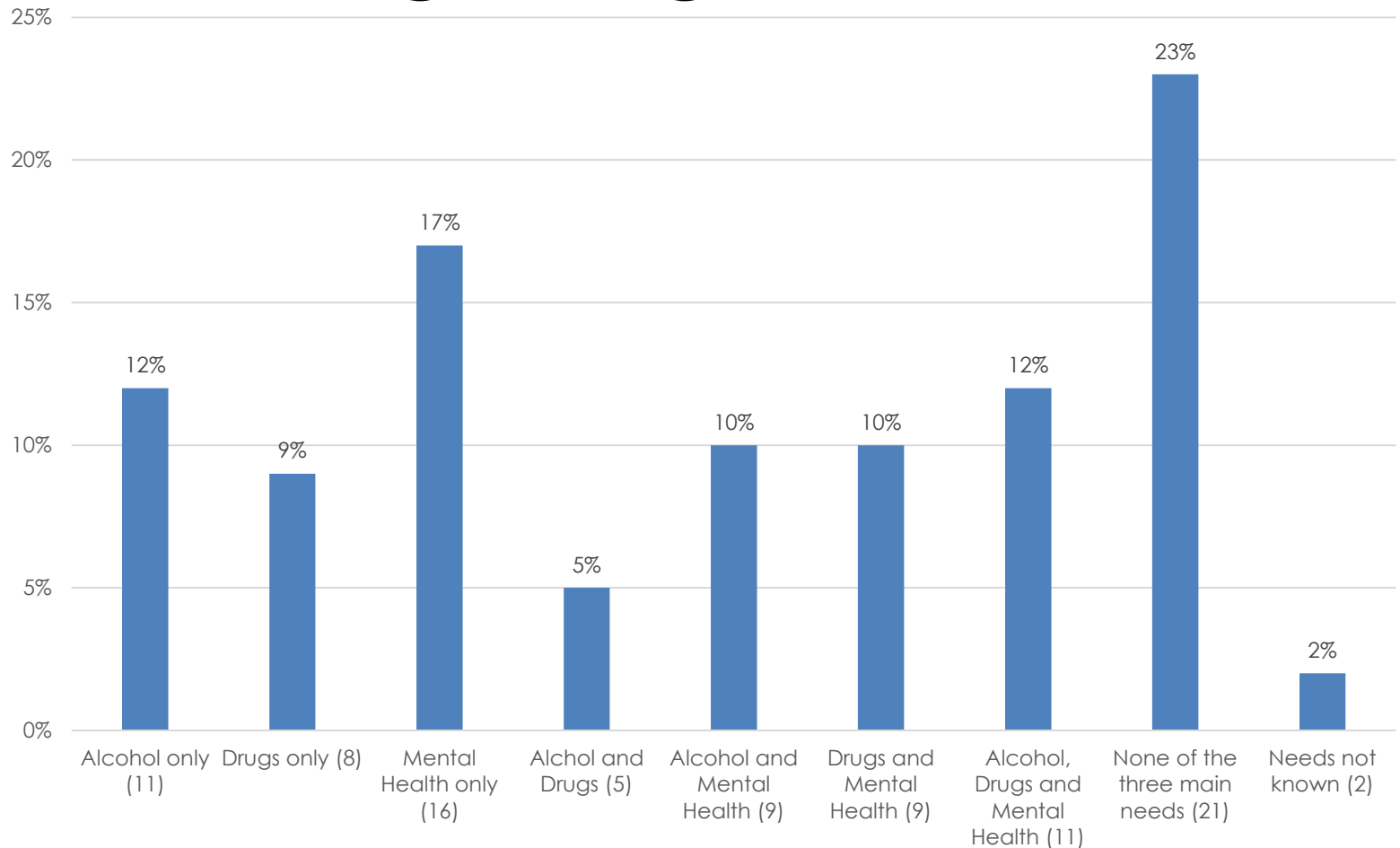
Nationality of COL rough sleepers during Q1 2020/21



Institutional & Armed Forces History- Q1 2020/21



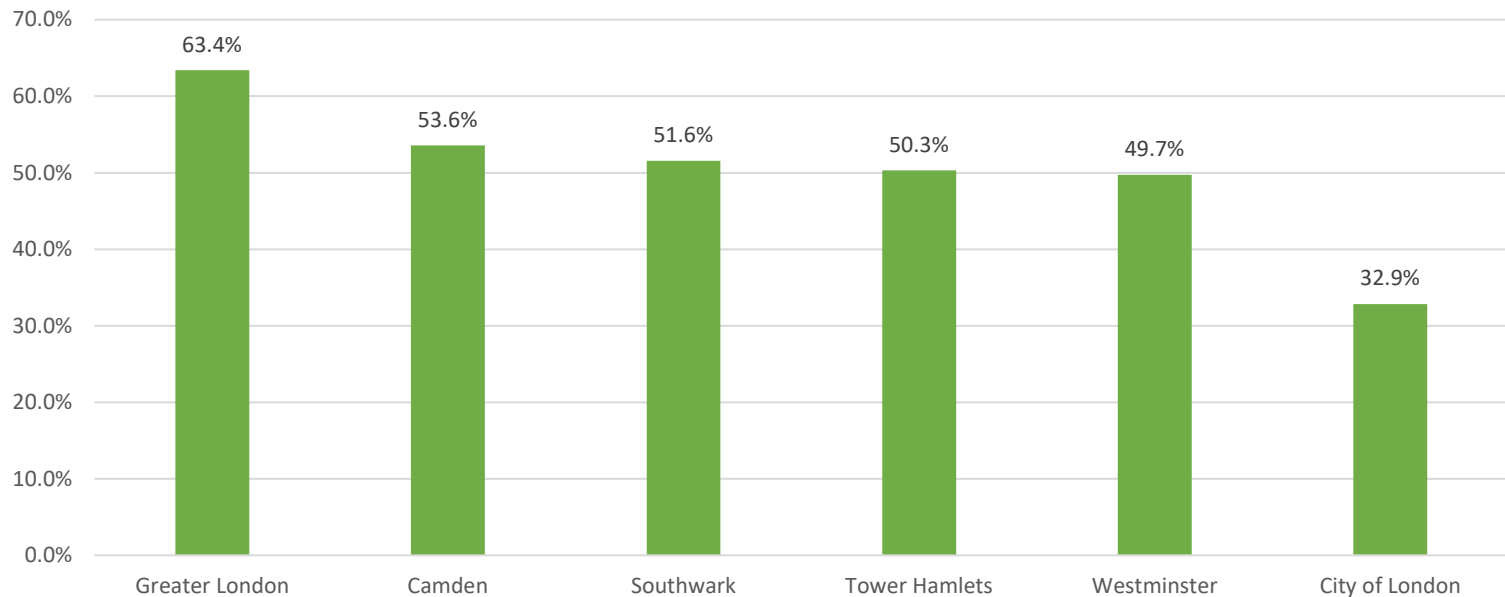
Support needs of people sleeping rough Q1 2020/21



New Rough Sleepers (Flow)

	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Q1 2020/21	DOT
City of London	45.00%	51.10%	52.80%	35.10%	47.80%	47.23%	32.85%	↓
Greater London	67.40%	65.20%	62.80%	59.50%	62.40%	65.75%	63.11%	↓

New rough sleepers as percentage of total rough sleepers compared with benchmark groups- Q1 2020/21





Percentage of new rough sleepers not spending a second night out (NSNO)

	2019/20				2020/21	Direction of travel (DOT)
	Q1	Q2	Q3	Q4	Q1	
City of London	63%	70%	40%	65%	63%	↔
Southwark	70%	71%	77%	74%	62%	↓
Tower Hamlets	84%	79%	42%	76%	81%	↑
Camden	75%	74%	74%	66%	68%	↔
Westminster	77%	87%	82%	87%	75%	↓
Greater London	80%	80%	77%	79%	81%	↔

Living on the streets longer-term rough sleepers (stock)

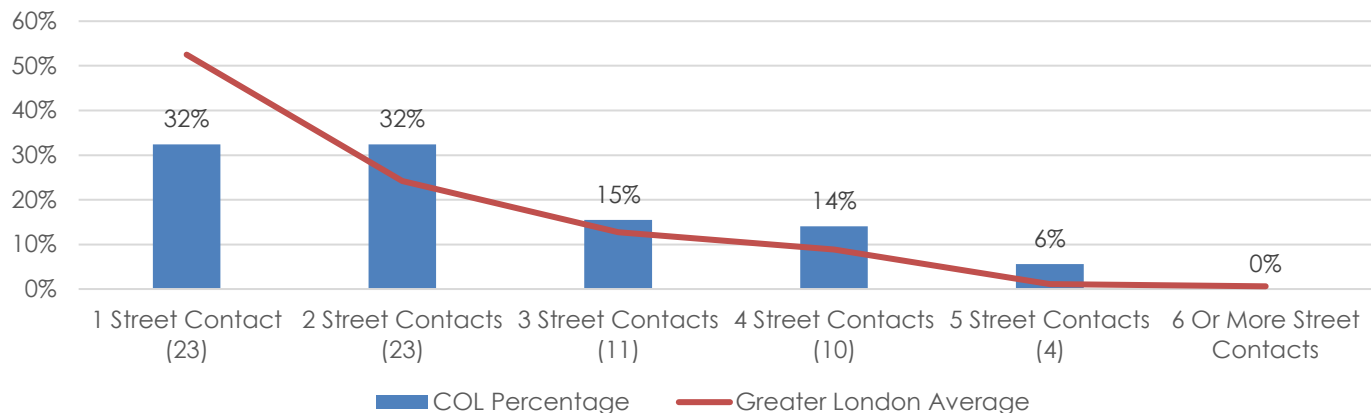
	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	Q1 2020/21	Yearly DOT
City of London	39.90%	35.90%	34.00%	48.30%	37.40%	32.48%	19.28%	↓
Greater London	21.00%	22.60%	24.40%	25.50%	23.50%	22.16%	6.24%	↓

	2018/19				2019/20				2020/21	% Share of LOS
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q1
City of London	↓ 34	↓ 30	↑ 66	↑ 74	↑ 65	↗ 59	↗ 58	↗ 59	↓ 27	19%
Southwark	19	24	23	17	23	22	27	30	33	15%
Tower Hamlets	18	20	13	18	17	18	12	16	11	7%
Camden	64	54	58	42	33	42	44	42	19	8%
Westminster	144	115	168	130	159	142	125	78	70	10%
Greater London	382	340	435	374	393	438	455	377	264	6%

Intermittent Rough Sleepers (Returners)

Intermittent/Returners	2019/20				2020/21	Direction of Travel
	Q1	Q2	Q3	Q4	Q1	
City of London	63	63	53	65	71	↑
Southwark	65	89	71	80	81	↔
Tower Hamlets	54	87	63	72	67	↓
Camden	97	129	125	125	98	↓
Westminster	311	355	332	360	297	↓
Greater London	1298	1504	1489	1495	1322	↓

Number of bedded down street contacts
Q1 2020/21



Quarterly Accommodation Stays

Accommodation	No. of stays					% share				
	2019/20				2020/21	2019/20				2020/21
	Q1	Q2	Q3	Q4	Q1	Q1	Q2	Q3	Q4	Q1
City Assessment Hubs	22	13	9	5	0	47%	32%	19%	7%	0%
Bed & breakfast	11	8	9	6	2	23%	20%	19%	8%	1%
Clinic/detox/rehab	0	0	0	0	0	0%	0%	0%	0%	0%
COVID-19 Emergency Accommodation (Local)	0	0	0	18	58	0%	0%	0%	25%	43%
COVID-19 Emergency Accommodation (Pan London)	0	0	0	8	63	0%	0%	0%	11%	46%
Hostel	5	3	7	8	8	11%	7%	15%	11%	6%
Long-term accommodation	1	3	2	2	3	2%	7%	4%	3%	2%
No second night out	0	0	0	0	0	0%	0%	0%	0%	0%
Temporary accommodation (local authority)	6	12	4	7	0	13%	29%	9%	10%	0%
SWEP (Local)	0	0	1	1	0	0%	0%	2%	1%	0%
SWEP (Pan-London)	0	0	0	0	0	0%	0%	0%	0%	0%
Winter/Night Shelter	2	1	7	0	0	4%	2%	15%	0%	0%
Total Stay	47	40	39	55	133	47	40	39	55	133

Committee: Homelessness and Rough Sleeping Sub-Committee	Dated: 01/10/2020
Subject: Credible Offer Policy	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Will Norman, Head of Homelessness Prevention and Rough Sleeping, Department of Community and Children's Services	

Summary

This report introduces the City of London's draft Credible Offer Policy for rough sleepers. The policy is designed to ensure that an equitable, effective and transparent approach is taken in the delivery of service offers to rough sleepers. The policy will be used to guide the work of our commissioned services, including the City of London Outreach team and Assessment Service.

The report establishes the need for a Credible Offer Policy, describes the process of review and sets out some key features within the policy.

Recommendation

Members are asked to:

- Note the report and recommend the policy advance to the Department of Community and Children's Services for approval.

Main Report

Background

1. It is common practice among outreach teams and assessment services across London to make offers of support and assistance designed to end a period of rough sleeping. Local authorities that commission rough sleeping services will almost certainly expect the work of their commissioned providers to focus on solving an individual's homelessness, rather than any actions that could sustain it.
2. Single Service Offers were introduced to London's rough sleeping sector at the time No Second Night Out (NSNO) was commissioned by the Greater London Authority (GLA). These offers are arrived at after a period of assessment by trained assessment and referral staff.
3. The concept of a single offer was designed to ensure that clients temporarily accommodated in basic environments such as NSNO assessment hubs did not

become stuck, therefore slowing the progression of casework for others and reducing the availability of NSNO to other outreach teams.

4. The service making the offer is usually invested in the offer being taken up; therefore, it is usually in the interest of the service to make an offer agreeable to the rough sleeper.
5. While the concept of service offers has been widely adopted for many years, the interpretation and delivery by local authorities and commissioned providers has varied.
6. The City of London expects its commissioned services to work toward ending an individual's rough sleeping. Despite this, we have a disproportionately large number of street-attached rough sleepers with lengthy histories of homelessness.
7. This characteristic is borne out through GLA data available for 2018/19 where 62% of all rough sleepers in Greater London were new to rough sleeping that year. In the City for the same period, this figure was just 15%.
8. Clear and viable service offers are essential to new rough sleepers, and rough sleepers who are already known to services. New or 'flow' rough sleepers should be aware of their options as soon as possible to minimise the risk that more complex behaviours, such drug and alcohol misuse, take hold. For longer-term rough sleepers, it may be more about challenging unwise decisions or addressing unmet needs.
9. Our Pop-up Hubs (and, more recently, our City of London Assessment Hub) have added a crucial element to our 'off the street' offer. These assessment settings are open to anyone found rough sleeping in the Square Mile and provide a safe and dignified space for our assessment staff and Outreach team to arrive at service offers.
10. In April we launched our COVID-19 contingency accommodation at the Youth Hostel Association (YHA) site at St Paul's. In line with the Government's 'Everybody In' call to local authorities, this service is available to anyone rough sleeping in the City, regardless of their eligibility, recourse to public funds, or connection to the City of London.
11. Currently the YHA is accommodating 35 guests, and we estimate that it could accommodate as many as 105 guests over the remaining eight months of the COVID-19 Recovery Plan. While we have not yet witnessed the increase in 'flow' rough sleeping numbers that many other Central London authorities have seen, we should expect numbers to rise as the Square Mile returns to normal.
12. The City's approach to making service offers is broadly in line with that of other local authorities and the GLA. However, it is inevitable that inconsistencies creep in to practice, and our commissioned services sometimes lack clarity about the nature of the offer they can make.

13. The Credible Offer Policy is designed to offer a reference point to City of London officers and commissioned providers to ensure that best practice is always applied. This is applicable to our COVID-19 Recovery Plan and all future work with rough sleepers carried out by our commissioned assessment and outreach services.

Current Position

14. A consultant with particular expertise in homelessness and rough sleeping sector commissioning and strategy has been engaged to assist us with our COVID-19 planning and Growth Programme work streams.

15. Included in this work package was the development of a Credible Offer Policy, which can be found at Appendix 1.

16. Key features of this policy include a definition of what constitutes a Credible Offer, and an explanation of how the policy should be operationalised.

17. The Policy indicates that a Credible Offer should:

- provide access to accommodation (hostel room, shared or self-contained housing, supported or independent) that meets the housing and support needs of the individual for at least the next six months
- provide access to accommodation that is affordable
- provide access to accommodation that is safe and sustainable, given the individual's support needs and circumstances
- provide access to accommodation in an area where the individual has, or can develop, social capital
- be discussed in detail with the individual rough sleeper so that the limitations, advantages and disadvantages of the offer are understood
- include all necessary support to take up the offer of accommodation (for example, travel costs, moving costs, being accompanied)
- where relevant and/or required by the accommodation provider, include an identified longer-term move-on option.

18. To ensure that a degree of objectivity was incorporated into the policy's design, we took the step of engaging Homeless Link to review the draft document and make recommendations. This can be found at Appendix 2.

19. A summary of the Homeless Link findings:

'The City's draft Credible Offer Policy provides a comprehensive approach for all rough sleepers, which is aligned with relevant national and local legal requirements and strategic aims around rough sleeping and supported with adequate resources. Discussions with comparators indicate the City's approach is in line with practice in these areas.'

20. Homeless Link made six recommendations, and all have been addressed in the final draft attached to this report (Appendix 1). A further point establishing the difference between a 'credible offer' and an 'initial offer' as part of a 'route off the

street’ as also been included. The additional passages have been temporarily highlighted in the draft policy.

21. A quick reference guide to this policy will be drafted at a later stage as a companion document.

Corporate & Strategic Implications

22. The Credible Offer Policy meets the following points in the City of London Corporate Plan:

- Contribute to a flourishing society:
 - People are safe and feel safe
 - People enjoy good health and wellbeing
 - People have equal opportunities to enrich their lives and reach their full potential.

23. The Credible Offer Policy meets the following points in the Homelessness and Rough Sleeping Strategy 2019–23:

- Everyone should have a route away from rough sleeping
- The impact of homelessness is reduced
- No one needs to return to rough sleeping.

Conclusion

24. Our commissioned services successfully apply a rapid assessment and referral approach to rough sleepers; however, the current COVID-19 crisis has forced us to reassess how clear, equitable and efficient this process is.

25. Our Growth Programme and, in particular, the new Assessment Service will benefit from a clear decision-making platform to ensure consistency and good practice.

26. The development of a Credible Offer Policy has benefitted from external review to ensure that the guidance therein is aligned with best practice elsewhere.

Appendices

- Appendix 1 – City of London Credible Offer Policy (Draft)
- Appendix 2 – Review of City of London Rough Sleeping: Credible Offer Policy (Homeless Link)

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DEPARTMENT OF COMMUNITY AND CHILDREN'S SERVICES.

ROUGH SLEEPING: CREDIBLE OFFERS POLICY

1. Introduction

The City of London's Homelessness Strategy 2019-23¹ sets out, amongst other things, how the City will work to end rough sleeping in the Square Mile in support of both the Mayor of London and the Government's strategic intention to do the same.

Our strategy states clearly that *"all those who are homeless on the streets of the City of London will be given an offer that will end their homelessness"* so that *"no-one has to live on the streets of the Square Mile."*

Rough sleeping statistics show that the majority of those who sleep rough in the City of London have a primary local connection to another area - whether in London, the UK or overseas. However, rather than using local connection rules to refuse to provide support to rough sleepers bedded down in the City, we feel it is our responsibility, as set out in the strategy, to make an offer of accommodation so that the individual can be supported off the streets as rapidly as possible. The scarcity of affordable move on accommodation (whether temporary or permanent) in the Square Mile means that often the offer that will be made will usually be for accommodation outside of the City but we wish to ensure the offer is as credible as possible so as to maximise the chances of each individual rough sleeper sustaining a life away from the streets.

This policy sets out what we in the City of London feel constitutes a "credible offer" of accommodation when we are supporting a rough sleeper to find a route off the streets. It also explains how the City of London outreach team will manage, and document, credible offers so that there is clarity on all sides and what happens in the unlikely event that an individual rough sleeper is unable or unwilling to take up such an offer.

This policy applies to those sleeping rough in the City, or rough sleepers who have been temporarily accommodated, to whom the City does not owe a duty under homelessness legislation. Where a statutory duty is owed, a different approach will be taken as governed by the law and the working practices of our Housing Options team. Details [here](#).

The policy has been independently reviewed by Homeless Link prior to its adoption and will be reviewed internally every six months.

2. What constitutes a "credible offer"?

Many local authorities have outreach teams that operate a "single service offer" policy, though this is not always written down. This means that a rough sleeper will be offered a single route away from the streets which they are expected, and encouraged, to take up. Usually, the individual is denied further assistance if the identified "single service offer" is refused as a means of encouraging take up.

Often this "single service offer" is an offer of accommodation considered suitable to the individual's needs (though perhaps not always in their preferred location). Sometimes it is an offer of supported reconnection to a home area with suitable accommodation identified and available to that specific individual. But, sometimes, the "single service offer" is an offer of reconnection to a home area without accommodation being identified and without support being provided.

The "single service offer" is usually recorded on CHAIN so that any outreach service or day centre working with the individual understands what has been offered and can reinforce

¹ <https://www.cityoflondon.gov.uk/assets/Services-DCCS/homelessness-strategy-2019-23.pdf>

the message that it remains the only route off the streets offered to the individual unless their circumstances change significantly.

In the City, our 24/7 assessment centre will offer an immediate “route off the streets” for all rough sleepers (unless the No Second Night Out service is appropriate and available). The assessment centre will provide a safe space in the City within which a rough sleeper can have their immediate needs met (physical and mental health, substance use, benefits) and work with staff to determine a credible accommodation offer, which may include supported reconnection to another area.

The City wishes to do better than to make a “single service offer” and, to that end, this policy ensures that rough sleepers bedded down in the Square Mile receive at least one “credible offer” of accommodation and support which, if accepted would make it unnecessary for them to sleep on the streets. **This is a separate process to the initial ‘route off the street’ offer routinely made to rough sleepers. We recognise that, despite our best efforts, this offer is not always accepted, and work should continue to develop a credible offer, while the client remains rough sleeping if necessary.**

We define a credible offer as one that:

- Provides access to accommodation (hostel room, shared or self-contained housing, supported or independent) that meets the housing and support needs of the individual for at least the next six months
- Provides access to accommodation that is affordable
- Provides access to accommodation that is safe and sustainable given the individual's support needs and circumstances
- Provides access to accommodation in an area where the individual has, or can develop, social capital
- Has been discussed in detail with the individual rough sleeper so that the limitations, advantages and disadvantages of the offer are understood
- Includes all necessary support to take up the offer of accommodation (eg: travel costs, moving costs, being accompanied)
- Where relevant and/or required by the accommodation provider, includes an identified longer term move on option.

Local connection rules, and the general scarcity of accommodation, means that local authorities often restrict access to accommodation pathways to those with a local connection and this means that the chances of being able to access suitable accommodation increase if an approach is made to a home area. For rough sleepers in the City of London, the majority of whom have a local connection outside of the City, the best available accommodation might be in another area but reconnection to an area outside of the City must always be underpinned by a detailed move on plan which guarantees that the individual will get the support they need to take up the credible offer of accommodation secured for them in that area and be properly linked in to local support services so they can sustain that accommodation.

The City does not consider that ticket-only reconnection – where rough sleepers are encouraged to board a bus, train or plane to another area without accommodation waiting for them – represents a credible offer. This is not only unfair to the individual but likely to be counterproductive as, without a credible offer of accommodation in that area, the rough sleeper may return to rough sleeping, in the City or elsewhere. We will only offer ticket-only reconnections where it is the explicitly stated intent of the individual that this is all they require.

In normal circumstances, a credible offer would also be one which the individual rough sleeper was completely supportive of. However, given the reality of the scarcity of affordable accommodation in the City, and in London in general, and the gatekeeping policies adopted by many local authorities, we recognise it will not always be possible to offer accommodation of a type or in an area which is the individual rough sleeper's absolute preference.

The City will continue to work to increase the availability, and variety, of accommodation which can be offered to rough sleepers who are bedded down in the City so as to better meet needs and offer more choice in determining a credible offer for each rough sleeper. This includes developing more supported accommodation, increasing the availability and variety of private rented sector accommodation, developing relationships with housing providers outside of London and outside of the UK, maximising use of the Clearing House and using Housing First as an option where appropriate. **Under some circumstances, offer recipients may be asked to consider accommodation offers beyond Greater London.**

3. The operation of this policy

It is the role of the outreach team (and/or the assessment centre staff) to work with individual rough sleepers to determine a credible offer of accommodation that will support the individual to exit rough sleeping and which is based on their needs, circumstances and preferences (where possible). It is also the role of these staff to ensure that the route into accommodation is expedited as far as possible, fully planned and that all necessary support is made available to the individual to take up the offer.

Service offers should be delivered tactfully and sensitively. Upon receipt of an offer the following timescales should apply:

- **A 3-day 'reflection period'. The aim is to allow service users time to disclose additional issues which may affect take-up of their offer, such as: sexuality or history of trafficking**
- **A further 4 days to prepare to move on – making necessary links with friends/family, statutory and/or voluntary services.**

The City will provide sufficient funds to service providers to enable provision of suitable support around moving off the streets. This may include, but is not limited to, travel costs, moving costs, clothing, essential items for the home, rent deposits, and/or worker time to accompany an individual to their accommodation. Experience from service providers suggests that accompanying an individual rough sleeper to their accommodation rather than just making travel arrangements makes it more likely the move will be successful.

A credible offer of accommodation in the UK can ordinarily only be made to rough sleepers who have recourse to public funds (unless, as is rarely the case, they can self-finance their accommodation through wages or other income). Staff will work to ascertain if there is any underlying entitlement to public funds through, for example, achieving settled status under the EU scheme or working with advice/legal services and/or the Home Office to regularise immigration status. If this is not possible – rendering credible offers of accommodation impossible – the outreach team and assessment centre staff will work with the individual rough sleeper to achieve a planned and supported return to a home country. Ordinarily, this will involve securing accommodation and/or support in-country and we will work with ethical reconnections providers to ensure this can be achieved. **Consideration will also be given to temporarily accommodating rough sleepers while immigration status is confirmed. In this case reasonable timescales should apply.**

Translation services will be offered as necessary to enable non-English speakers to fully understand their credible offer and consideration will be given to the wording and structure of offers to guarantee clarity and avoid confusion and ambiguity.

Working in a psychologically informed way, staff will seek to develop and secure agreement of, and engagement with, the credible offer of accommodation. Credible offers – once determined – will be documented, with a copy being provided to the individual rough sleeper. The reasons why the offer[s] is/are felt to be credible will be included and the right of review. It will also be entered on CHAIN.

Where an individual indicates they are not happy with their offer, it will be discussed with them and they will be given the opportunity to have the offer reviewed by either the Outreach Manager (or their delegate if they are not available) or the Assessment Centre manager (or their delegate if they are not available). On the rare occasions that the managers (and/or delegates) are not available, a member of the rough sleeping team in the City will review the offer.

The outcome of the review will either be that the offer[s] is/are considered credible taking into account all the circumstances (ie: the availability of accommodation, the individual's circumstances and support needs, the support available, the strength of their connection to the area where the accommodation has been secured, etc.) or it/they will be withdrawn and another credible offer developed as quickly as possible which addresses whatever deficit or limitation that caused the first offer[s] to be withdrawn.

If, after review, the offer[s] is/are deemed credible and suitable, all steps will be taken to persuade the individual rough sleeper of the benefits of the accommodation secured and of the limitations of what else might be available. This will include making it clear that other boroughs take a similar, and in some cases, much harsher approach so moving to another area to sleep rough will not generate better opportunities.

If the individual continues to refuse to engage with, or accept, the credible offer[s] of accommodation that has/have been made, the following action may be taken:

- For current rough sleepers, outreach workers will be expected to maintain contact, continue to highlight the benefits of the credible offer[s] and look for other opportunities to persuade the individual to accept a route off the street using a personalised and psychologically informed approach so as to prevent entrenchment.
- For those accommodated in emergency accommodation funded by the City (assessment centre, B&B, hotels, hostels, etc), staff will continue to highlight the benefits of the credible offer[s] while making it clear that failure to engage with the move will lead to their current accommodation being withdrawn.
- For those accommodated in temporary accommodation (assessment centre, B&B, hotels, short stay hostels) who still refuse to engage after staff have made it clear that their current accommodation will be withdrawn, four weeks' notice will be served. The credible offer[s] will be re-iterated during the notice period and all steps taken to avoid a return to the streets once the notice period expires.
- For those returning to the streets after having refused one or more credible offers of accommodation, outreach workers will be expected to maintain contact, continue to highlight the benefits of the credible offer[s] but, crucially, keep looking for other opportunities to persuade the individual to accept a route off the street using a personalised and psychologically informed approach so as to prevent entrenchment
- **Any enforcement actions directed by the City of London will be linked to demonstrable anti-social behaviour and not the refusal of a credible service offer.**

A minority of rough sleepers already have accommodation they can return to (eg: a house they own in Romania, a family in Doncaster who would welcome them home, a council flat in Bexley that they could return to with some support) so, after checking that the accommodation is safe, suitable and still available, individuals in this situation would not be offered further accommodation. Given the scarcity of accommodation in London and the restricted options available to the City, their credible offer would be a supported return to the accommodation they already have available and the credible offers policy, as set out above, would apply.

4. Summary

Making credible offers of accommodation to a rough sleeper, on the streets or in emergency accommodation, is the best way of securing a sustainable route off the streets and delivering on the City's strategic objective that no-one needs to sleep rough on the streets of the Square Mile.

An offer of accommodation, unreasonably refused, would usually see a local authority discharge their duty to a homeless person under intentionality rules. This credible offer policy seeks to reflect the existing legislation and practice around statutory homelessness in that respect but goes further in ensuring that, where doubts exist about the credibility or suitability of an accommodation offer, a second offer is made.

The policy also goes further than most local authorities in ensuring that all rough sleepers in the City who have recourse to public funds – whether they have a local connection or not – are offered some form of accommodation and all necessary support to take up that accommodation. Where rough sleepers have no recourse, every effort will be made to regularise their status so that they can claim public funds and be made a credible offer. Where this is not possible, ethical, supported reconnection will be offered.

The City does not wish to adopt policies that are significantly different to those of other local authorities in London because there is a danger that, in doing so, we may create a perverse incentive for people to choose to bed down in the Square Mile. However, we will not support ticket-only reconnection practices and we will only consider reconnection a credible offer if accommodation is available in the area where a rough sleeper is being reconnected to. We consider this to be best practice.



REVIEW OF CITY OF LONDON ROUGH SLEEPING: CREDIBLE OFFERS POLICY

1.0 Overview

The City of London's Credible Offers policy for rough sleepers aims to provide an immediate post COVID-19 response and a longer-term framework for outreach and resettlement staff working in the City, including management and recording arrangements for credible service offers.

Homeless Link is a recognised expert on sector good practice – working with homelessness organisations across England to develop new approaches and improve current practice to supporting people out of homelessness.

Homeless Link has been asked to review the City's draft Credible Offers policy, to provide an independent perspective and ensure it offers a fair and equitable approach for people sleeping rough in the City. The work has involved two elements:

- Review of the draft policy
- Discussions with commissioners in comparator London boroughs and GLA, to understand their current approach to credible accommodation offers for rough sleepers and to highlight good practice which might be applicable to the City's policy.

2.0 Policy review

The Credible Offers policy has been reviewed using the following agreed criteria:

- Does the policy support relevant national and local legal requirements and strategic aims around rough sleeping?
- Does the policy cover credible offers for all cohorts of rough sleepers in the City, ie: people with support needs, UK and non-UK nationals and people with NRPF (No Recourse to Public Funds)?
- Is there is a clear process for making credible offers, including any right of appeal?
- Is the policy feasible in terms of meeting the accommodation and support needs of rough sleepers in the City and providing the resources which are likely to be needed to achieve this?

2.1 Does the Credible Offers policy support relevant national and local legal requirements and strategic aims around rough sleeping?

The following are relevant to the Credible Offers policy:

- The Rough Sleeping Strategy (MHCLG, 2018)
- Mayor of London's Rough Sleeping Commissioning Framework (GLA, 2018)
- City of London Homelessness Strategy, 2019-23
- City of London Temporary Allocation Policy (2019)
- Homelessness Reduction Act (HRA).

The draft Credible Offers policy supports national and local strategy objectives through its promotion of a rapid housing response. This provides a route away from homelessness for people sleeping rough in the City, helps to prevent repeat homelessness and provides a rapid and sustained resolution to this when homelessness takes place.

The draft policy's comprehensive criteria about what constitutes a credible offer – including safety, affordability and with access to support to meet service users' individual needs – makes it more likely that rough sleepers will take up move-on offers and sustain this accommodation in the longer-term. This approach also supports the London Mayor's commissioning priorities around preventing repeat and entrenched homelessness. In addition, the City's draft policy supports the Mayor's Commissioning Framework's cross-cutting priority around tackling rough sleeping amongst non-UK nationals.

The draft policy is consistent with the overall aims of the Homelessness Reduction Act and provides a comparable level and type of support to that given to single homeless people who make a homelessness presentation under this legislation:

- Both the HRA and draft Credible Offers policy ensure all applicants receive a comprehensive assessment of their housing and support needs; this includes people who lack a local connection to the City of London
- Both ensure that accommodation offers are accessible to the individual for at least six months and take account of their individual accommodation and support needs
- Neither the HRA nor the Credible Offers policy undertake to make a further accommodation offer to individuals who are found via assessment to have existing safe, suitable and available accommodation elsewhere.

The offer made to rough sleepers and single homeless people in the City potentially differ in two respects:

- **Local connection requirements.** The draft Credible Offers policy sets out an intention to ensure that all rough sleepers in the City with recourse to public funds are offered accommodation and necessary support to take up that accommodation, regardless of their local connection.

Comment. As it is difficult to ascertain the local authority area of origin for many people sleeping rough in the City, this can be viewed as a pragmatic solution and also one which is likely to reduce levels of rough sleeping, especially entrenched rough sleeping, in the City.

- **Second accommodation offer.** The draft Credible Offers policy allows for rough sleepers to receive a second accommodation offer in certain circumstances.

Comment. In practice the approaches taken by the HRA and the Credible Offers policy are similar, as both seek to ensure that final accommodation offers fulfil suitability criteria. Both the Credible Offers and HRA involve a single 'live' offer being available at any point in time.

The draft Credible Offers policy is consistent with the approach set out in the City of London Temporary Accommodation Allocation Policy:

- Both apply a similar range of criteria for suitable accommodation offers, ie: availability, affordability, including space standards and Health & Safety considerations
- Both allow the City to search for and make accommodation offers outside the City boundaries, where suitable accommodation is not available locally and/or there is a need to widen the pool of affordable housing
- Both for accommodation offers within the private rented sector
- Both contain similar commitments to housing individuals close to public transport, shops and other facilities.

Other criteria contained in the City's TA Allocation Policy, such as the need for access to childcare and workplaces, are less likely to be applicable to the City's rough sleeping cohort. It is therefore justifiable to exclude them from the Credible Offers policy.

2.2 Does the Credible Offers policy cover all cohorts of rough sleepers in the City?

The draft policy is applicable to all rough sleepers who have been temporarily accommodated by the City and are not owed a duty under homelessness legislation. It is clear that credible offers are not made in the UK to rough sleepers with NRPF (these individuals are offered supported reconnection to their home country).

The draft policy commits to providing accommodation which meets the housing and support needs of individuals and which is 'safe and sustainable' for them. It is assumed this includes access to relevant support services – especially mental health and substance misuse. These are highlighted in the City of London Homelessness Strategy as being common underlying causes of rough sleeping and homelessness.

2.3 Is there is a clear process for making credible offers, including any right of appeal?

The draft policy sets out criteria for what constitutes a credible offer, including: meeting an individual's accommodation and support needs, affordability, safety and proximity to existing social networks and developing a move-on plan, where this is required by the accommodation provider. The draft policy explicitly excludes unsupported ('ticket-only') reconnections from credible offers.

It is clear which staff are involved in developing credible offers (outreach and/or assessment centre staff) and how rough sleepers are involved in the process. The draft policy makes clear that credible offers are a mutually agreed decision between staff and service users (rather than meeting a legal definition of suitability). Discussions/decisions are recorded and service users are given copies.

The draft policy does not specifically state if non-UK rough sleepers have the right to be accommodated temporarily by the City whilst their immigration status is being investigated and what happens to people who are unwilling to engage with the reconnection process.

The draft policy sets out the right for service users to review their credible offers, how this process works and that this review may lead to an alternative credible offer.

It is clear what happens if service users subsequently refuse this final offer.

Comment. The draft policy states outreach workers should 'keep looking for other opportunities' for rough sleepers. It is assumed that this involves re-stating the previous/existing offer to service users, rather than making a further credible offer and that this has not been stated in the policy because this might discourage take-up of the existing credible offer.

2.4 Is the draft policy feasible in terms of meeting the accommodation and support needs of City rough sleepers and the resources which are likely to be available to achieve this?

Policy implementation is supported by the provision of a 24/7 assessment centre (which acts as a base for carrying out needs assessments). There is a stated commitment to increase the availability and affordability of accommodation, including: supported accommodation, PRS, Clearing House and Housing First. Policy implementation is also supported by commitments around providing adequate funding for support, travel costs, home items and rent deposits. Access to floating support services are not explicitly mentioned, but are assumed to be part of this package.

The recognition that it is not possible to meet all City of London rough sleepers' preferences in relation to accommodation type and area is realistic given housing market pressures across London.

Comments:

- The draft policy does not specifically mention ensuring sufficient outreach capacity for rapid initial engagement and assessment and maintaining an assertive and consistent approach to reinforcing credible offers.
- The draft policy does not mention the possibility of enforcement action at any point. This might be especially relevant if individual rough sleepers are involved in begging and other behaviours that cause nuisance and/or which may sustain them on the streets. This could be argued to have a wider impact on rough sleepers' mental and physical health and wider community needs.

3.0 Discussions with comparator boroughs

Short discussions were held with commissioners in: Hackney, Lambeth and Westminster and also the GLA's Rough Sleeping, Housing and Land team. Discussions focused on the following key areas:

- The extent and scope of the approaches used
- The process for making credible offers
- Practice around reconnections
- Steps taken when service users refuse credible offers.

3.1 Scope of policy and approaches used

All comparators utilise a system of credible offers for rough sleepers in their area. However, the City is currently alone in having written a comprehensive policy setting out its approach. It has therefore not been possible to provide copies for this review.

GLA is currently developing a move-on policy for rough sleepers accommodated in hotels procured during the COVID-19 outbreak. This applies to the five service providers involved in supporting residents (St Mungo's, Look Ahead Care and Support, DePaul, SHP and Thames Reach), but not other service providers or boroughs. It is understood the final policy will cover all rough sleeper cohorts. However, work to date has focused on the approach for 'complex' groups: non-UK nationals and residents in 'shielding' groups.

3.2 Approach to making credible offers

The City's draft policy is consistent with comparators in seeking to provide a person-centred, psychologically and trauma-informed approach for assessing rough sleepers' support needs and developing a move-on offer and in seeking multi-agency input into this process, where possible. These elements are commonly understood to improve the quality of move-on offers, rough sleepers' commitment to the process, their preparedness and likelihood of sustaining a tenancy in the longer-term.

Hackney, Lambeth and GLA follow a similar approach to the City in having a credible offer process which relates to all accommodation residents. Westminster's approach differs in that it makes single service offers to people in its assessment centre, but not automatically to hostel residents. The rationale for this is that all hostel residents have significant needs and require a more nuanced approach to achieve move on.

The City follows a similar approach to comparators in that move-on offers are commonly made into shared or self-contained PRS accommodation – with other options, such as supported housing and Clearing House tenancies being reserved for more vulnerable or complex rough sleepers. Similarly, both the City and comparators expect service users to consider out of area moves – most likely in an outer London borough. Hackney goes further by including out of London areas within its move-on offer. In line with the City, all comparators give service users clear messages about the above as early as possible in their stay, to better manage expectations.

The City's policy goes further than comparators in setting out comprehensive criteria for what constitutes a credible offer, including affordability and social capital considerations. This is a useful addition, which is likely to provide greater clarity for both service users and staff involved.

Unlike the City, comparators do not offer a formal right of review of credible offers and the possibility of a second offer. GLA has agreed in principle that service users within complex groups will be allowed a 'reflection period' after receiving their credible offer. This sets up the possibility of a second offer in certain cases.

The GLA policy is also expected to contain a timeframe for service users to consider their credible offer. This includes:

- The 3-day 'reflection period'. The aim is to allow service users time to disclose additional issues which may affect take-up of their offer, such as: sexuality or history of trafficking
- A further 4 days to prepare to move on – making necessary links with friends/family, statutory and/or voluntary services.

The GLA policy is also expected to state the offer of translation services to support rough sleepers whose first language is not English to understand their credible offer.

Following review, Westminster has simplified the language used in move-on letters given to service users and increased pictorial representations. This is considered to have increased vulnerable service users' understanding of the process and take-up of offers

3.3 Local connection and reconnections work

The City's policy is consistent with comparators: all offer reconnection to a home area for rough sleepers who lack a local connection to the presenting borough. Non-UK nationals with additional support needs are commonly offered voluntary reconnection via specialist services, including Routes Home (run by St Mungo's). Where possible, access is provided to supported, rather than 'ticket only' reconnection services, to increase the chances of success and reduce repeat homelessness.

The City's policy goes further than comparators in stating explicitly that non-supported reconnection does not constitute a credible offer and in guaranteeing service users a detailed move-on plan containing details of the support they can expect to receive in the area they are reconnected to.

3.4 Refusing credible offers and appeals

The City's policy takes a similar approach to comparators in using eviction from accommodation as a last resort for service users who have refused a credible offer.

Discussions indicate that, in practice, eviction is much more likely with residents who have low support needs and that more flexibility is applied in enforcing credible service offers with residents who are considered more vulnerable. However, this is not set out in written policies.

Some comparators do not have a fully-developed approach around responsibilities for outreach and other staff around working with service users who have refused credible service offers and returned to rough sleeping. The City's setting out of such expectations in its policy is a good practice measure which is likely to reduce the length of time people spend on the streets during these periods.

4.0 Summary and recommendations

The City's draft Credible Offers policy provides a comprehensive approach for all rough sleepers which is aligned with relevant national and local legal requirements and strategic aims around rough sleeping and supported with adequate resources. Discussions with comparators indicate the City's approach is in line with practice in these areas.

To further strengthen its approach, the City may wish to consider the following for inclusion in its final Credible Offers policy:

- Clarify if rough sleepers have the right to be accommodated temporarily by the City whilst their immigration status is being investigated
- Clarify if enforcement action will ever be considered to increase take-up of credible offers by service users involved in begging and behaviours that cause nuisance and/or which may sustain them on the streets
- Include an expectation that service users also consider moves to out of London areas
- Following the GLA example, set out a timeframe for service users and staff around considering credible offers and preparing for move on
- Explicitly state that translation services will be offered as necessary to enable non-English speakers to fully understand their credible offer
- Review the language and style of credible offer letters given to service users to increase clarity and accessibility.

Committee: Homelessness and Rough Sleeping Sub-Committee	Dated: 01/10/2020
Subject: COVID-19 Recovery Plan Update	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report authors: Kirsty Lowe, Rough Sleeping Service Manager, Department of Community and Children's Services Simon Young, Rough Sleeping Coordinator, Department of Community and Children's Services	

Summary

The ongoing COVID-19 pandemic has presented public bodies and commissioned providers with an unprecedented challenge. On 22 March, the Government formally announced its social distancing policy and, on 26 March, the new COVID -19 Taskforce launched the 'Everyone In' initiative to support local authorities in helping rough sleepers to access accommodation.

This report updates the summary provided to the June Sub-Committee relating to: action taken in supporting rough sleepers through the adaptations and additions to our service delivery; the benefit of partnership work with the Greater London Authority (GLA); and some indications of the impact of this work.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. In Quarter 4 of financial year 2019/20, a total of 172 individual rough sleepers were seen bedded down by the City of London (CoL) commissioned Outreach team.
2. In January 2020, a total of 45 individuals were counted as part of our bi-monthly street counts.
3. The first UK cases of COVID-19 in the general population were reported towards the end of January, and infection rates escalated throughout February and March.

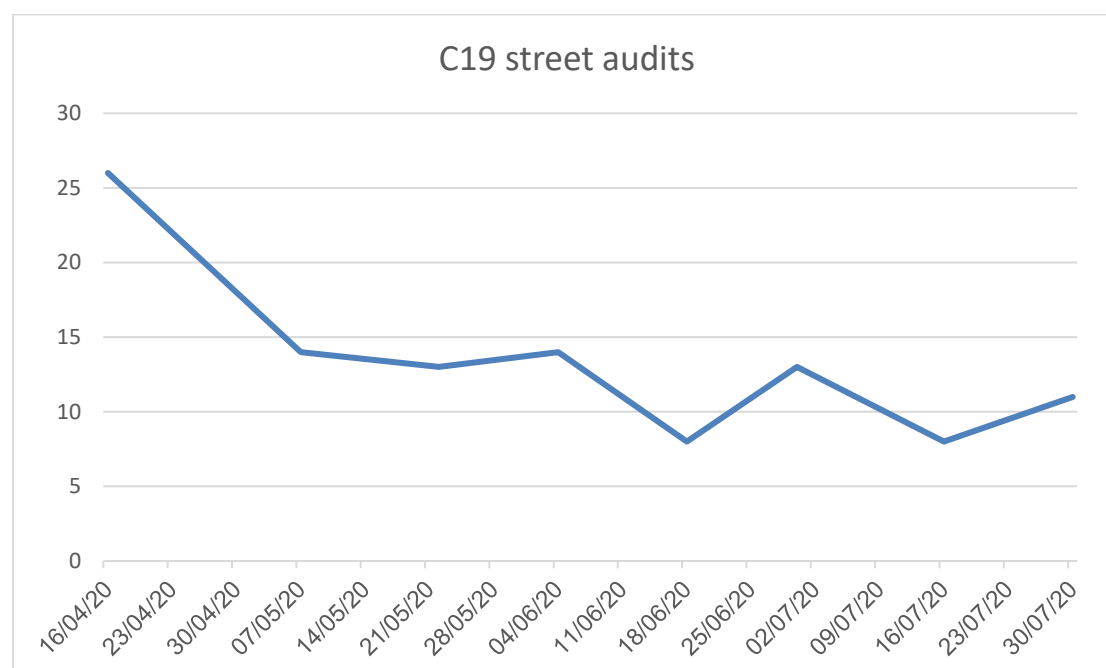
4. Towards the end of February and the beginning of March, there was an indication that COVID-19 posed a significant risk to those rough sleeping, particularly in densely populated areas such as the CoL, due to its rapidity of infection and the indicated effect on those with pre-existing health conditions.
5. While a vulnerability to COVID-19 remains inherent in this cohort, infection rates have remained very low. Our COVID-19 Recovery Plan and related activity therefore continues as a set of preventative measures, and to sustain and build on the reduced level of rough sleeping we have witnessed in the Square Mile.

Street Audits

6. The CoL Outreach team and partners provide regular street audit shifts, visiting all hotspot sites and known individuals across the CoL to capture an accurate 'on the night' figure of rough sleeping in the authority area.
7. Street audits are akin to street counts. Pre-COVID-19, CoL had committed to operate street audits on a bi-monthly basis, using fewer personnel to enable a high level of regularity with as low an impact as possible on operational services.
8. The last street count took place on 31 January 2020, and 41 individuals were seen rough sleeping on the night.
9. Audits conducted during the COVID-19 pandemic show that this figure has reduced to an average of 14 individuals currently rough sleeping on a given night.
 - a) The following table shows all audit shifts carried out and the number of individuals seen bedded down on the night.

Date	No. of rough sleepers
16/04/2020	26
07/05/2020	14
22/05/2020	13
04/06/2020	14
18/06/2020	8
30/06/2020	13
16/07/2020	8
30/07/2020	11

- b) The line graph below shows the downward trend of the number of rough sleepers seen on each of the audit shifts.



10. Regular audit shifts will continue as part of the CoL COVID-19 response, to ensure that the City has a good insight into any potential changes to the known rough sleeping population in the City.

CoL COVID-19 emergency assessment service

11. The St Paul's Youth Hostels Association (YHA) building at 36 Carter Lane is leased to the City until March 2021. It plays a vital role in the CoL COVID-19 response. For several months the hostel has accommodated approximately 20 of the City's well-known, street-attached rough sleepers; for many, this was the first move off the streets for several years.
12. On 12 August 2020, the YHA building began to accept new residents, which was carefully managed in partnership with City Outreach and the YHA support provider, Providence Row Housing Association (PRHA). Since mid-August the booking system has staggered a maximum of two new residents each day, affording a gradual adjustment for the existing guests and staff.
13. Careful consideration and consultation with Public Health England (PHE) has taken place, and the new COVID-19 Standard Operating Procedures (SOP) for homelessness hostels have been shared with the City Assessment Service (CAS) to ensure that all possible recommendations are implemented.
14. The implementation of the required SOP recommendations are being reviewed on a weekly basis with PRHA and all other contractors.
15. As of 1 September 2020, a total of 39 individuals have been placed at the YHA, with 35 individuals currently residing at the service. The remaining bed spaces

are available as emergency bed spaces (EBS) for outreach workers to use as needed.

16. The CAS support team is provided by PRHA at the YHA. CAS provides 24/7 support to residents, with the aim of stabilising individuals, working collaboratively with other support services to ensure that residents needs are met, and jointly preparing clients for the move from the YHA.
17. It has been recognised by the City that, as the hostel population increases, the focus and resource inevitably shifts to the move on and resettlement of YHA residents. To enable a steady flow of new guests into the hostel, and for those who are ready to move out of the hostel, the CAS team needs more capacity.
18. The City has agreed that, along with an enhanced service specification, it will fund a further two posts for the remainder of the financial year – bringing the total workforce to 15.
19. Key to this new enhanced staff structure is the recruitment of a contracts manager who will have oversight of the service and staff, providing much-needed support to the co-ordinator role and the development of robust systems and processes. The new specification requires the CAS team to further develop personalised action plans for all guests within a set timeframe, and to aim to support a minimum of 25% of guests to claim Housing Benefits.
20. Early on in the CoL COVID-19 response, the importance of providing sustenance to YHA residents was identified as a way of encouraging rough sleepers to take up and maintain the offer of accommodation, and so to reduce residents' exposure to COVID-19. Recently a new catering contract has been confirmed with CH&CO. Catering Ltd to provide three meals a day to a minimum of 20 individuals, including weekends and bank holidays until March 2021.

Accommodation outcomes during COVID-19

21. Since late March 2020, the homelessness team has received regular live data from the CoL Outreach team and services operated by PRHA of accommodation outcomes secured for City rough sleepers.
22. Data submitted has included information that was not submitted to CHAIN due to some services not having access to the Combined Homelessness and Information Network (CHAIN) database.
23. To ensure that this data is accurate, CoL officers have used live data submissions along with information recorded on CHAIN, and have maintained records of these data sets in an amalgamated localised system.
24. All data is reflective of data that has been made available to CoL officers, and it provides the best picture of outcomes related to rough sleeping from 1 March 2020 to 1 September 2020.
25. A total of 274 accommodation outcomes, affecting 130 individuals, have been recorded by the CoL Outreach team and support services commissioned by the GLA.

26. To date there have been 24 positive move-ons from City-funded COVID-19 accommodation, led by the City Outreach team and CAS.

- Hotel accommodation:
 - two international reconnections
 - four placements into long-term supported hostels
 - 14 moves to YHA
 - one move to family/friends
- YHA:
 - one private rented accommodation
 - one placement into long-term supported hostel
- Temporary accommodation:
 - one clearing house.

Ministry of Housing, Communities & Local Government (MHCLG)

27. A submission was made to MHCLG's Next Steps Accommodation Programme on 20 August 2020. This fund makes a total of £105 million available to councils in England to help meet the initial cost burden of supporting the Government's Everyone In initiative. The fund covered COVID-19 activity delivered between August 2020 and 31 March 2021.

28. All submissions were co-produced with MHCLG advisors. The City of London submission totalled £941,600.

Conclusion

29. The COVID-19 Recovery Plan is well underway and remains an important focus of the CoL Homelessness team and commissioned services workload. The additional service delivery of the audit shifts, an increase in capacity at CAS/YHA and the potential of future funding through the MHCLG will enable the CoL to continue to provide a robust and considered response to the COVID-19 pandemic.

Appendices

- None

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Committee: Homeless and Rough Sleeping Sub-Committee	Dated: 01/10/2020
Subject: Homelessness and Rough Sleeping – Growth Programme Update	Public
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Will Norman, Head of Homelessness Prevention & Rough Sleeping	

Summary

The following report provides an update regarding the capacity-building programme underway to develop additional interventions for rough sleepers. This growth programme predates COVID-19, although our COVID-19 Recovery Plan and our growth proposals converge in several areas.

This report updates Members on our progress against our growth objectives only.

Recommendations

Members are asked to:

- Note the report

Main Report

Background

1. In the July report to Members, a Rough Sleeping Recovery Group within the Department of Community and Children's Services (DCCS) had been set up to oversee implementation of the COVID-19 Recovery Plan and connected elements of the Growth Programme.
2. As referenced above, in addition to the short-term recovery objectives, there is specific activity that is being managed in parallel to develop service capacity in the long term. This is being overseen together due to the significant overlap in benefits for our homeless and rough sleeping community. Activity is aligned to the growth proposal approved by Members in March this year as part of the Rough Sleeping Options Appraisal New Intervention Proposal.

Current Position

COVID-19 Recovery

3. A full update on our progress through the COVID-19 Recovery Plan can be found in a separate report. A brief overview is included for context below.

4. A supported Hostel (Youth Hostel Association, St Paul's) was secured on a temporary basis to provide additional capacity in the short term to ensure that all those wanting to leave the streets had supported accommodation to move on from. This has been secured until the end of March 2021. Work is underway to provide all clients a long-term offer of support to a more sustainable private and supported accommodation options.
5. The YHA is currently accommodating 37 individuals, with capacity for eight more. A support contract with Providence Row Housing Association is in place to manage the hostel on our behalf.
6. The service specification was developed using input from Public Health colleagues and Department of Health guidelines. COVID-19 Standard Operating Procedures for transmission avoidance, infection control and local outbreak protocols are in place.

New interventions

7. As referenced in paragraph 3, the second work stream within scope of the Rough Sleeping Recovery Group includes the longer-term interventions being developed by DCCS Commissioning and Rough Sleeping services in conjunction with City Procurement. This activity has three core components, with a focus on increasing the capacity and quality of the service:
 - a. **Assessment Centre** – This service is intended to be a venue that street outreach workers can bring rough sleepers to from the Square Mile, where they can be accommodated, assessed, have their immediate physical and health care needs attended to, and be supported to develop a route off the streets that is particular to their circumstance and needs.
 - b. **High Support Hostel** – This service is intended to be a project where rough sleepers with multiple and complex needs can be accommodated. The City currently has no such facility, and the purchasing of beds in other projects/boroughs is not meeting demand, leaving some of our most vulnerable rough sleepers without a suitable supported accommodation option. The hostel will provide accommodation for one to two years, with a staff team providing a psychologically informed support service supplemented with visiting support from mental health, primary care, domiciliary care and substance misuse services. Residents will be supported to move to longer-term accommodation that is suited to their circumstance and needs.
 - c. **Private Rented Sector (PRS) procurement framework** – This update to our existing purchasing framework would help to increase capacity and purchasing options for the service.

Assessment Centre

8. Data about rough sleeping in the Square Mile suggests that we need a facility that can accommodate 10 to 15 people at any time, is open to admissions 24/7, and

has a maximum length of stay of 28 days. The hope is that many people would be housed or safely reconnected to accommodation in their home areas much quicker than this. There is a strong desire to host the assessment centre within the Square Mile and we have prioritised finding buildings here.

9. Eight locations have been explored for a site to locate a new assessment centre within the square mile. A more detailed options appraisal of these sites can be found at Appendix 1. There are currently two front runners and, together with colleagues in City Planning and Surveyors, work is underway to provide a feasibility assessment of both sites. Both will require fitting out with pods/cubicles if we decide to use them, and both will need some work to improve bathrooms/toilet facilities.
10. St Mary-at-Hill church is potentially ready to move into with only cosmetic changes needed, whereas Snow Hill Court would require more extensive improvements, as parts of the building we would want to use are in a dilapidated state. The latter option may require a phased approach, with capacity at launch being below our desired level, with further works completed over time.
11. A service specification is well developed with final details dependent on the location. We are consulting with Public Health colleagues and await more detailed operating guidance from the Ministry of Housing, Communities & Local Government.

High Support Hostel

12. Data about rough sleeping in the Square Mile suggests that we need a facility that can accommodate 30 to 35 people at any time. It is accepted that a purpose-built facility (or one that can be adapted) is not likely to be available within the Square Mile, so we have widened our search for suitable buildings to the immediate surroundings of the City.
13. Discussions with Procurement and Legal have determined that the best way of safely procuring a high support hostel is to advertise in a single process for a provider/building combination. It is accepted that there are likely to be few buildings available, and the tender process might mean that we end up negotiating with one provider rather than choosing between multiple buildings, but this is still considered the best approach. We have already undertaken a market-testing event where we invited more than 20 of London's current hostel providers to ask them to look for buildings and to be prepared to tender for the service. However, thus far, the event has only garnered a single, unsuitable offer.
14. We are currently focusing our attention on one location. We have visited and discussed the potential use of the site with the provider (they are interested). As a result, we are making plans to approach the local authority to test their willingness to have us run a support service for City rough sleepers from the site.
15. To support this approach, we have developed a package of mitigations to help answer questions regarding jurisdictions and costs associated with social care and support, mental health and substance misuse treatment. Assuming that the host

local authority is content, we could potentially move quickly with the accelerated procurement process described above. The building would require decanting before we could begin to use it, but most of the residents in occupation have low support needs and would require PRS flats rather than more complicated move-on arrangements. We could support this process to gain quicker access to the building.

16. We are looking at costs and building management arrangements that would be required for the site were we to use the building. Assuming that nothing prohibitive emerges, we would move to start the tender process as soon as the local authority is able to.

PRS Move-on Scheme

17. This work stream looks to build on the work undertaken by our homelessness prevention project; No First Night Out (NFNO). Our learning from NFNO demonstrates the value of establishing partnerships with ethical PRS providers to secure more sustainable long-term housing solutions.
18. To enable this approach to continue beyond the planned lifespan of NFNO (to 31 March 2021) we plan to operate an approved provider framework.
19. A service specification and method statement are complete, with the next steps involving a live tendering process.

Next Steps

20. The following next steps are being taken:

- Continuing to assess the viability of the Assessment Centre and Hostel sites which seem most likely to meet needs
- Continuing to look for alternative sites that may prove more suitable
- Developing detailed service specifications and related procurement documentation so that we are ready to move as soon as a building is determined suitable
- Continuing to seek expert input from colleagues, partners, providers
- Bringing back a detailed paper once sites have been chosen to seek permission to move forward with those specific sites
- Tendering process for PRS Move-on Scheme (approved provider framework).

Corporate & Strategic Implications

21. The Credible Offer Policy meets the following points in the City of London Corporate Plan:

- Contribute to a flourishing society:
 - People are safe and feel safe
 - People enjoy good health and wellbeing

- People have equal opportunities to enrich their lives and reach their full potential.

22. The Credible Offer Policy meets the following points in the Homelessness and Rough Sleeping Strategy 2019–23:

- Everyone should have a route away from rough sleeping
- The impact of homelessness is reduced
- No one needs to return to rough sleeping.

Conclusion

At this stage of the growth programme we are focusing on three principle workstreams. All three are progressing well but are moving into complicated phases. The primary concerns are to clarify which premises we will take forward for both the assessment centre and the high support hostel.

Appendices

- Appendix 1 – Rough Sleeping Commissioning Projects – Site Visits

Will Norman

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CITY OF LONDON ROUGH SLEEPING COMMISSIONING PROJECTS – SITE OPTIONS

Purpose of paper:

- To update on progress with identifying sites
- To seek a steer on the current options being considered

Introduction:

Development funding has been provided to expand the service offer for rough sleepers and make achieving the strategic goal of ending rough sleeping within the Square Mile more likely. Two of the key projects being developed with this funding are an assessment centre and a high support hostel. Revenue funding is available until the end of March 2025 and £1m of capital funding has been allocated to support leasing/purchase costs and/or refurbishment costs.

Officers have been looking at potential sites for these services over the past three months – including those brought forward by providers, those offered up by the Diocese or those suggested by Members or officers in the City of London.

This paper provides an update on the work to identify suitable sites and the intended procurement route to establish the services.

Assessment Centre:

This service is intended to be a venue to which street outreach workers can bring rough sleepers from the Square Mile where they can be accommodated, assessed, have their immediate physical and health care needs attended to and be supported to develop a route off the streets that is particular to their circumstance and needs.

Data about rough sleeping in the Square Mile suggests we need a facility that can accommodate 10-15 people at any time, is open to admissions 24/7 and has an average length of stay of 28 days. The hope is that many people would be reconnected to accommodation in their home areas much quicker than this. There is a strong desire to host the assessment centre within the Square Mile and we have prioritised looking for buildings here.

Given the short length of stay, assessment centres have often provided camp beds for residents but COVID-19 precludes this going forward. We are considering pods/partitioned rooms for our assessment centre. There are many on the market that are easy to assemble, cost-effective and have been designed for this purpose and we have already checked with Public Health as to the best design in terms of infection control (ie: degree of separation needed and ease of disinfecting).

The outreach team's effectiveness is limited by the lack of emergency accommodation and, as the number of rough sleepers continues to grow across London, the need for an assessment centre becomes more acute. The intention, therefore, is to set up something urgently for a period of 12-18 months using a waiver to the usual competitive procurement requirements while we secure a longer term building (assuming the short-term premises we obtain are not suitable for a longer term use) and undertake the competitive tendering exercise we need to do to award the longer term contract during this period. Legal and Procurement colleagues have advised that the simplest and safest way to award the short term contract is to vary the outreach contract recently awarded to Thames Reach so that they can run the assessment centre for us. It's also a good fit strategically to do it this way.

We have considered the following buildings for the assessment centre:

Name	Location	Benefits	Disadvantages	Status
East India Dock Rd	Tower Hamlets	Good size	Not in the City Already valuable as currently used Provider lacks experience Limited office and shared space	Ruled out
Hackney Rd	Tower Hamlets	10 bed hostel with good communal facilities	Not in the City Included within larger project, which would need to be used as well Lack of certainty on the part of LBTH as to whether it's available or not Previous locality issues around anti-social behaviour	Ruled out
Old Fire Station	Islington	Good size, lots of flexible space on the ground floor	Not in the City Would only be available as part of purchasing the whole site (using the rest of the space as a hostel) and the building is old, inaccessible and needs work and isn't suitable for the hostel	Ruled out
St Mary-At-Hill church	City of London	Good size, lots of flexible space on the ground floor Accessible Immediately available High ceilings would support cubicles Good location Office space on site Needs limited refurbishment	Issue of partitioning/ventilating the space needs exploring Lack of showering facilities – would need to install temporary showers or refit bathrooms as wet rooms (or both)	Possible
St Mary-At-Hill flats	City of London	Good location Good size	Prohibitively expensive Not accessible for those with mobility issues Space not very flexible	Ruled out
Booth House	Tower Hamlets	n/a	Not in the City In very poor state of repair Not clear how we would make partial use of the building and what plans there are for the remainder of the (large) hostel	Ruled out

Riverside Camberwell	Southwark	Purpose built former sheltered housing scheme, good size	Not in the City Wrong end of Southwark Next to vulnerable older persons' housing scheme	Ruled out
Snow Hill Court	City of London	Good location Good size, assuming all space can be brought into use Lots of flexible rooms/space that could be partitioned or have cubicles installed Some outside space Available immediately	Needs extensive refurbishment – in some places the refurb is cosmetic, in others structural Issue of ventilating the space needs considering May be expensive as a long term facility, though landlord is willing to negotiate lengthy rent free period if we refurbish	Possible
Peter Bedford project	Hackney	Available fairly immediately. Social landlord	Not in the City Too small (only room for 8- 10 pods) Communal kitchen and bathrooms are shared with another organization using the building No room for extra showers	Ruled out

We are currently focusing our attention on two of the venues listed above – a disused suite of offices on Snow Hill Court and St Mary-At-Hill church. Both were suggested to us by the Diocese. Both will require fitting out with pods/cubicles if we decide to use them and both will need some work to improve bathrooms/toilet facilities. The church is potentially ready to move into with only cosmetic changes needed whereas Snow Hill Court would require more extensive improvements as parts of the building we would want to use are in a dilapidated state.

We have visited both sites twice – the second time with Thames Reach accompanying us – and we are now at the stage of making more detailed design determinations and estimating costs and timescales for works. It may be that we use both sites – the church as an interim centre and Snow Hill Court as a longer term facility. A further paper will bring forward one or both of these options in more detail should we seek to take either premises forward. In the meantime, we continue to look for alternative sites.

High support hostel:

This service is intended to be a project where rough sleepers with multiple and complex needs can be accommodated. The City currently has no such facility and the purchasing of beds in other projects/boroughs is not meeting demand, leaving some of our most vulnerable rough sleepers without a suitable supported accommodation option. The hostel will provide accommodation for 1-2 years with a staff team providing a psychologically informed support service supplemented with visiting support from mental health, primary care, domiciliary care and substance misuse services. Residents will be supported to move to longer term accommodation which is suited to their circumstance and needs.

Data about rough sleeping in the Square Mile suggests we need a facility that can accommodate 25-30 people at any time. It is accepted that a purpose built facility (or one that can be adapted) is not likely to be available within the Square Mile so we have widened our search for suitable buildings to the immediate surroundings of the City.

Discussions with Procurement and Legal have determined that the best way of safely procuring a high support hostel is to advertise in a single process for a provider/building combination. It is accepted that there are likely to be few buildings available and the tender process might mean that we end up negotiating with one provider rather than choosing between multiple buildings but this is still considered the best approach. We have already undertaken a market testing event where we invited 20+ of London's current hostel providers to ask them to look for buildings and to be prepared to tender for the service but, thus far, the event has only garnered a single, unsuitable offer.

We have considered the following buildings for the high support hostel:

Name	Location	Benefits	Disadvantages	Status
East India Dock Rd	Tower Hamlets	n/a	Too small	Ruled out
Hackney Rd	Tower Hamlets	10 bed hostel with good communal facilities on the same site as 25 self-contained flats	Locality not suitable, anti-social behaviour complaints drove the council to stop using the premises as a high support hostel previously Layout not suitable – flats at the back have no communal space or staff presence	Ruled out
Old Fire Station	Islington	Good size, lots of space	Location not great – busy junction of main roads Would only be available as part of purchasing the whole site (using the rest of the space as an assessment centre) and the building is old, inaccessible and needs work. Top floor is unusable because of asbestos. Flats are too large	Ruled out
Booth House	Tower Hamlets	n/a	In very poor state of repair Not clear how we would make partial use of the building (100+ rooms currently) and what plans there are for the remainder of the building	Ruled out
Riverside Camberwell	Southwark	Purpose built former sheltered housing scheme, good size	Not in the City Wrong end of Southwark with poor transport links, not likely to be popular with rough sleepers	Ruled out

Grange Road	Southwark	Good location (2 miles from Guildhall) Purpose built Good size – 32 rooms (9 in an annex and 23 in main hostel) Good garden Quiet street Available fairly immediately Owned by St Mungo's, an experienced hostel provider Southwark decommissioned the service and seem to be disinterested in using it to the full Annex/hostel layout would support City's needs to separate some of the older rough sleepers from the more chaotic younger ones	Next to vulnerable older persons' housing scheme Council may be hostile to the provider changing use as they still wish to operate a MH project on the site Needs some cosmetic improvement Needs more space for staff to work with residents (provider planning to build something in the garden) Need to ensure Southwark are okay with use – some risks for them around importing needs to the borough Accessibility – annex only has stairs	Possible
Thrale St	Lambeth	Good size, 25 beds Former care home so fairly accessible	Local authority hostile to us using the site Provider not very experienced with rough sleepers but doesn't want the building used by anyone else Previous use as a hostel saw a lot of neighbor complaints, site backs onto a school	Ruled out

We are currently focusing our attention on the Grange Road building. We have visited, discussed potential use of the site with the provider (they are very keen) and are making plans to approach Southwark to test their willingness to have us run a support service for City rough sleepers from the site. Assuming that Southwark are content, we could potentially move quickly with the accelerated procurement process described above. The building would require decanting before we could begin to use it but most of the residents in occupation have low support needs and would require PRS flats rather than more complicated move on arrangements. We could support this process to gain quicker access to the building.

We are looking at costs and building management arrangements that would be required by St Mungo's were we to use the building. Assuming this does not throw up anything prohibitive, we would move to start the tender process as soon as Southwark give us the green light.

Support sought from partners:

We are discussing the lay-out, set-up and operating regime of the assessment centre with Public Health colleagues. As there will be shared space and sleeping in cubicles/partitioned rooms, we need to be sure that airflow and ventilation is to a safe standard and that we have sufficient space and facilities for testing, isolating and minimising risk associated with 'high touch' areas and other shared spaces. We will similarly seek their input around the high support hostel – though the risks are lower given that rooms are self-contained.

We are discussing the surveying of sites and the leasing arrangements with the City surveying team and, as stated, the procurement approaches have been cleared in meetings with Procurement and Legal colleagues.

Once we are clearer on which sites we are seeking to bring into use, we will also have discussions with community safety, social care and revenues and benefits. We will also discuss health, primary care, substance misuse and mental health support needed from partners for both projects.

Next steps:

1. Continuing to assess the viability of the sites which seem most likely to meet needs
2. Continuing to look for alternative sites that may prove more suitable
3. Developing detailed service specifications and related procurement documentation so we are ready to move as soon as a building is determined suitable
4. Continuing to seek expert input from colleagues, partners, providers
5. Bring back a detailed paper once sites have been chosen to seek permission to move forward with those specific sites

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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