



City of London Rough Sleeping and COVID-19 Recovery Plan:

Next steps for rough sleepers placed in emergency accommodation by the City of London

Contents

1. Executive summary.....	2
2. Principles.....	3
3. Scope.....	4
4. Working together in the City of London to deliver the plan.....	5
5. Where are we now?.....	6
6. Key risks, issues and mitigations.....	8
7. Action plan based on delivery principles.....	10
8. Planning assumptions and constraints.....	12
9. Monitoring.....	12

1. Executive summary

- 1.1. In March 2020, plans were put in place by the Government, Greater London Authority (GLA) and London boroughs to protect London's rough sleepers – on the streets, in assessment centres and in shelters – from COVID-19, and limit wider transmission. These involved the swift mass procurement of safe accommodation, primarily hotels for the GLA, and – working with charities, the NHS and public health – the provision of wraparound and specialist support.
- 1.2. The purpose of this approach is to reduce the impact of COVID-19 on people sleeping rough, and ultimately to prevent deaths during this public health emergency. Its basic principles are to:
 - focus on people with a history of rough sleeping who are on the streets or in emergency accommodation, such as shelters and assessment centres, where it is difficult to self-isolate or socially distance
 - make sure that these people have access to the facilities that enable them to adhere to public health guidance on hygiene or isolation – including en-suite facilities and no shared sleeping spaces – to prevent and reduce infection
 - utilise powers and funding in place as a result of the COVID-19 emergency to assist, where appropriate, those with no recourse to public funds (NRPF) who require shelter and other forms of support
 - provide support to those accommodated, to enable them to remain protected from COVID-19 and meet their wider needs.
- 1.3. At the same time, through the Outreach service delivered by St Mungo's, the City of London was able to place rough sleepers in the Square Mile into provision procured by both the GLA and City of London.
- 1.4. In May, the GLA – working with London councils, Public Health England (PHE), the NHS and supported by the Ministry of Housing, Communities and Local Government (MHCLG) – produced a Next Steps Strategy setting out broad principles and responsibilities to support future accommodation and wellbeing plans for all those in emergency accommodation (see Appendix 1). The delivery and oversight of the plan will be via a central Rough Sleeping Strategic Group which will report to the Government's Taskforce on the COVID-19 Response to Rough Sleeping and Next Steps led by Dame Louise Casey.
- 1.5. This document is the City of London's own plan and should be read in conjunction with the overarching regional Next Steps plan.

2. Principles

2.1. The City of London plan will support the regional plan and ensure that:

Principles aligned to the Rough Sleeping Strategic Group

- a) No one who has been placed in emergency accommodation by the City of London in response to the COVID-19 public health crisis is asked to leave that emergency accommodation without an offer of support to end their rough sleeping. We will work hard to ensure that the offer of support is safe and suitable given individual needs and circumstances.
- b) There is capacity and capability to deliver and implement 'In for Good' offers of support for all City of London rough sleepers.
- c) Continued protection from COVID-19 is provided for those City of London rough sleepers who need it, using a cohort approach to care, protect and prevent.
- d) The City of London will work with London boroughs, so that no boroughs, including the City of London, are disproportionately impacted as a result of hosting rough sleepers from outside their boroughs during the emergency.
- e) The City of London supports the London-wide approach which will complement the efforts of individual boroughs and providers, and vice versa.
- f) There is an integrated approach with City and Hackney health and social care to secure access to services and continuity of care.
- g) The roll-out of the plan is gradual, to avoid a 'cliff edge' and overload of services as lockdown is lifted.

City of London Specific Principles

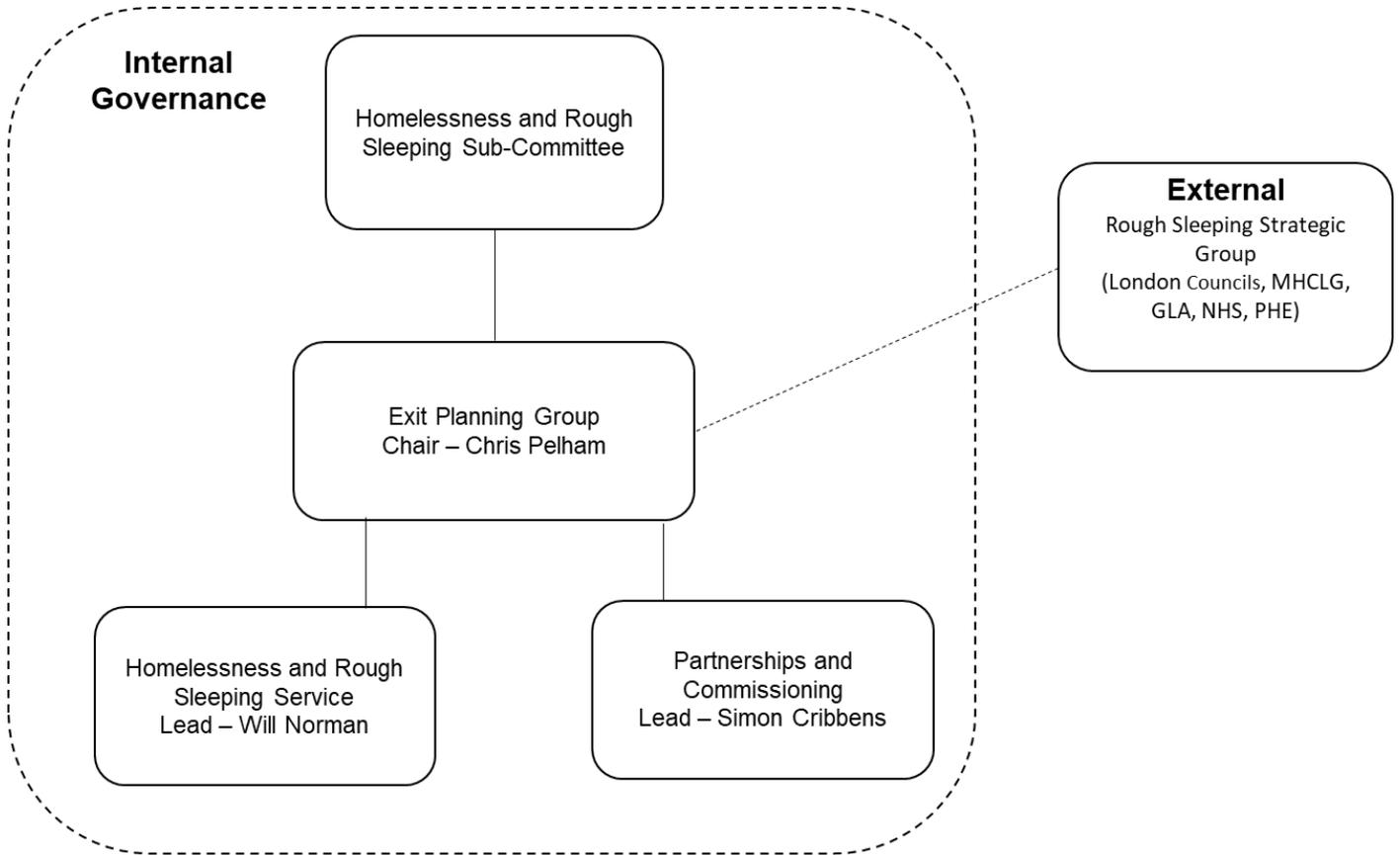
- h) Some rough sleepers may choose to refuse their offer of support. The City of London will work hard to prevent this but, ultimately, the public health emergency does not bestow upon the City of London the power, or the responsibility, to keep accommodating rough sleepers in emergency accommodation once an offer of support more suitable to the rough sleeper's needs and circumstances has been made and refused.
- i) Enable the transition from recovery plans to long-term capacity development.

3. Scope

- 3.1. This planning document reflects the City of London's specific plans, which have been designed in collaboration with a larger effort being steered by Rough Sleeping Strategic Group (London councils, MHCLG, GLA, NHS, PHE) to ensure the safe recovery of the rough sleeping population following the COVID-19 health crisis. In addition to ensuring safe recovery from COVID-19, this plan will also include actions specific to developing new interventions that will increase the long-term capacity of the service, as endorsed by Members in March 2020. The scope of this Recovery Plan extends to the cohort of rough sleepers that the City of London has a responsibility for, which is determined by those individuals with a local connection and those who were present in the City of London prior to 1 March 2020. On this basis, analysis of our client data anticipates that the City of London will be responsible for an estimated 61 individuals (56 of those are known – see 5.1) as part of the Recovery Plan and our goal will be to secure an accommodation or reconnection outcome for those individuals. In addition, an estimated 13 rough sleepers who remain on the streets will require additional support and inclusion within service planning.
- 3.2. The scale and type of support required for this cohort will be determined by individual clients' personal support needs, their vulnerability to COVID-19 and their longer-term accommodation or reconnection requirements. To achieve this, it is anticipated that a range of accommodation, reconnection and support options will be necessary, which will include a combination of the following:
- a) intensive and assertive casework
 - b) private rented sector (PRS) accommodation
 - c) supported accommodation, such as hostels
 - d) reconnection services to locations outside the City of London (and outside the UK) where clients have a local link and entitlement to services
 - e) tenancy support for those who require it
 - f) health services to continue to care, protect and prevent with respect to COVID-19 (and those issues that are a barrier to move on or life away from streets).
- 3.3. To avoid duplication of effort with the wider London approach, the Recovery Planning Group will liaise with the Rough Sleeping Strategic Group to ensure that the scope of our Recovery Planning does not overlap with theirs. It will also ensure that our combined effort provides offers of support to all individuals within our responsibility.
- 3.4. Finally, the Recovery Planning scope will include the longer-term proposal set out by the City of London prior to the COVID-19 health crisis. We will explore options that help join up the outcomes of this plan with the ongoing ambition set out in the City of London growth proposal to ensure that there is long-term capacity being developed as part of the Recovery Plan.

4. Working together in the City of London to deliver the plan

4.1. This planning document provides an overview of governance in relation to the plan. The delivery of the plan will be overseen by the Recovery Planning Group and report into the City of London’s Homelessness and Rough Sleeping Sub-Committee and Health and Wellbeing Board.



Group	Responsibility
Homelessness and Rough Sleeping Homelessness Sub-Committee and Health and Wellbeing Board	Provide governance oversight and member input to support and monitor delivery
Recovery Planning Group	<p>Design and develop the Recovery Plan</p> <p>Ensure implementation of the plan through resources attached to the Exit Group and in liaison with the City of London service</p> <p>Monitor success against the eight principles within the scope of the plan and mitigate risks and issues</p> <p>Raise issues and challenges to the Life off the Streets Taskforce and Rough Sleeping Strategic Group</p> <p>Provide strategic public health leadership via Directors of Public Health</p> <p>Commission relevant accommodation, reconnection and public health services, including drug and alcohol treatment services</p> <p>Provide key stakeholders with regular communication updates on progress against the plan</p>
Homelessness and Rough Sleeping Service & Partnerships and Commissioning	<p>Advise the Recovery Planning Group on best practice</p> <p>Implement activity within the plan where required</p>
External to City of London – Rough Sleeping Strategic Group (London councils, MHCLG, GLA, NHS, PHE)	<p>Seek mitigations and solutions to risks and challenges that could impede the effective delivery of the strategy</p> <p>Monitor and oversee delivery</p> <p>Report to the Rough Sleeping COVID-19 Response and Recovery Taskforce</p>

5. Where are we now?

Overview

- 5.1. In the first phase of the COVID-19 pandemic, the majority of rough sleepers were accommodated from the City's streets. Of this cohort, a number of individuals have some form of local connection to the City and need a new longer-term solution. In addition, many were rough sleeping in the City before 1 March 2020, and though they may have an unclear connection to the City, they also require a new longer-term service offer. It is anticipated therefore, that all those who remain rough sleeping in the City at this time, and those who have a local connection or were rough sleeping in the City prior to 1 March and were offered emergency accommodation fall within the scope of this Recovery Plan.
- 5.2. A detailed needs assessment has been completed on the whole cohort, which will be kept up to date to help ensure the most suitable pathway and support for each individual. The needs assessment provides information related to the following:

- a) current accommodation
- b) pre-COVID-19 situation
- c) local connection and reconnection needs
- d) needs and risks (physical/mental health, substance dependency, mobility, known behaviours)
- e) accommodation needs (short term and long term)
- f) support needs.

Based on the needs assessment (as of 3 June 2020) it is anticipated that the following provision will be required to support the cohort currently within emergency accommodation:

Pathway	Number of individuals anticipated to require pathway
Assistance to reconnect to family and friends/return home	4
PRS/social housing tenancy with start-up floating support	8
Supported housing or housing led with floating support	31
Housing First/Supported Housing with intensive support	13
Total	56

- 5.3. Within the cohort it is expected that just under half have no recourse to public funds (NRPF). It is acknowledged by the external Rough Sleeping Strategic Group that these cohorts will present an additional challenge, and therefore the City of London Recovery Planning Group will work with colleagues internally and externally to develop offers of support. Though the needs assessments may indicate that a particular rough sleeper needs a PRS move-on offer or a supported accommodation place, nationality and lack of recourse to public funds might mean that this is not possible. The City will, in such circumstances, either make sure a safe and supported reconnections offer is made, or will work with individual rough sleepers to achieve settled status and access to public funds dependent on whether the individual is likely to qualify.
- 5.4. From April, street surveys have increased to fortnightly. There are 13 individuals remaining on the streets (as of 21 May), and Outreach teams are working to support them into accommodation.

Provision of accommodation

- 5.5. The current supply of emergency accommodation is only secure in the short term (until the end of June). Recent pronouncements by the GLA suggest that they are keen to avoid creating a cliff-edge for boroughs around withdrawal of the accommodation they are providing. They are exploring the use of student accommodation if hotels begin to reopen and want to end their involvement in the scheme. We are writing to the Rough Sleeping Strategic Group (which includes the GLA) to ask for clarification on whether extension of provision is available where individuals are awaiting move-on accommodation options. It is also intended that a planned extension of the 16 City of London funded hotel beds is explored, as more time will certainly be needed to secure suitable reconnection or accommodation outcomes.
- 5.6. In addition to emergency accommodation already occupied, the Recovery Planning Group is in the process of developing more capacity for move-on accommodation. A 20-bed supported accommodation hostel has been leased through the Youth Hostels Association (YHA) within the City of London, with eight clients already moved into the site. The lease for the YHA currently runs until 21 July 2020 and can therefore provide immediate capacity. An increase in the number of beds available is being explored and there is positive dialogue with the YHA regarding an extension of the lease for at least six months.

5.7. Alongside the lack of access to public funds for many rough sleepers, one of the key challenges identified by the Recovery Planning Group will be City of London's ability to develop enough capacity for move-on accommodation for the cohort of rough sleepers identified as in scope. For the longer-term, capacity will be required to prevent clients from moving back onto the streets. Below is a summary of additional pathways where it is recommended that capacity be explored:

- a) Spot purchasing of supported accommodation from other local authorities
- b) Procurement of a medium- to long-term City of London owned supported accommodation site
- c) Additional PRS through networks such as No First Night Out
- d) Resource to ensure reconnection services have the right capacity to deliver
- e) Moving on of current clients in existing accommodation to create availability
- f) Housing First scheme capacity.

Provision of welfare support and health services

- 5.8. Support to those in the GLA-procured accommodation (mainly hotels) is being overseen by St Mungo's, with Depaul UK, Thames Reach, Single Homeless Project and Look Ahead also directly supporting people in several hotels, and Change Grow Live, along with other substance misuse providers supplying specialist support and co-ordination. A similar approach is being adopted for emergency support provided by the City of London, with Providence Row Housing Association, Westminster Drug Project, Doctors of the World and the Outreach team providing support to residents through regular check-ups.
- 5.9. All the hotels and other buildings used by the GLA have 24-hour cover, and City of London has commissioned a 24-hour service through Providence Row Housing Association.
- 5.10. A set of primary care standards were developed for Sustainability and Transformation Partnerships to provide full coverage of health provision to all rough sleepers in emergency accommodation. A pan-London substance service has been commissioned by the GLA, (procured by City of London), for those in the accommodation provided by the GLA and borough-commissioned hotels.
- 5.11. The NHS is also providing outreach COVID-19 testing to hostels and hotel accommodation, and has secured a triage connection for registration to primary care, medication, mental health, community health, GPs and drug and alcohol services. In addition to this, public health screening is taking place for blood-borne communicable diseases.

6. Key risks, issues and mitigations

The recommended mitigations will be included in the Recovery Planning Group's ongoing activities.

- 6.1. The Recovery Planning Group will lead on developing delivery plans (see 7.0) for next steps for the City of London cohort in emergency accommodation. Those who come in off the streets will also be supported through the Recovery Plan. The capacity and options available to provide solutions for such a large number of people within a short timetable are extremely limited.
- 6.2. It is recognised that securing an accommodation or reconnection solution often takes a considerable time, particularly for those rough sleepers who have NRPF or whose vulnerability to COVID-19 means that they require self-contained supported accommodation. Capacity will therefore be needed to be maintained, either within the emergency accommodation currently procured or through other interim solutions to allow time for this complex work to take place.

- 6.3. **Private rented sector (PRS):** The PRS will provide the accommodation solution for some of those accommodated. Key challenges will be securing this level of accommodation within a short timescale, within London Housing Allowance rates. In addition, those moving into the PRS will need tenancy support for a limited period to ensure that they can maintain their tenancy and do not return to rough sleeping. The GLA is exploring a large expansion of their current PRS floating support service. It will be important to establish whether the GLA approach is going to have enough capacity to provide support for the City of London cohort who are accommodated in the PRS.
- 6.4. **Non-UK nationals:** A large proportion of those accommodated are non-UK nationals, some of whom are ineligible for benefits and, in many cases, wider support. Most are EEA nationals, while others' immigration status means they have NRPF. Work is underway to understand in more detail the circumstances and immigration status of this cohort to inform possible solutions. However, once they leave the hotels and other emergency accommodation, their options are likely to be extremely limited. Some may wish to go home and could be supported with voluntary reconnection. However, for many this may not be possible or desirable. Others may be supported into employment. Those with NRPF may need support to resolve their complex immigration status, and EEA nationals may need support with settled status applications. But these options are challenging to implement unless people can be accommodated. With the ongoing public health risk, there is a case for considering whether support (including accommodation) could continue to be provided where there are no other sustainable options, and decisions need to be made about what the City does if people refuse a reasonable reconnection offer.
- 6.5. **People with high support needs:** A significant number of those currently accommodated will need hostels or other supported accommodation – accommodation that is in very short supply and which may not be suitable for those who are vulnerable to COVID-19, given the shared setting. Consideration will need to be given to securing self-contained supported accommodation (including Housing First) and to how hostel spaces could be freed up for this group where this is safe. Discussions are underway with the YHA to secure capacity for the medium term. One possibility being considered by the Rough Sleeping Strategic Group would be to create hostel capacity by providing independent accommodation – potentially through the Clearing House – to people currently in hostels who are ready to move on. It is acknowledged, however, that vacancies will be limited, and several local authorities will have a similar requirements. Providing more supported PRS move-on offers to hostels may also work to create valuable vacancies for those in hotels.
- Ensuring access to appropriate and consistent mental health and substance misuse support, including residential detox and rehab, is also critical for this group. This may be more challenging once the cohort is dispersed away from the hotels and the additional support from GLA is not available.
- 6.6. **Vulnerable people with ongoing medical risks:** Rough sleepers are significantly more likely to have underlying health conditions and poor overall health that make them more vulnerable to COVID-19. A significant number of those accommodated are medically vulnerable to COVID-19, some of whom require shielding. Their new dwelling on leaving temporary accommodation must therefore be suitable for shielding, and self-isolation. COVID-protect facilities that support vulnerable rough sleepers are already under pressure. Accommodation options are constrained by the type of support needed and the ability to place people into shared accommodation while social distancing and social isolation measures are in place.
- 6.7. **New rough sleepers and returners:** The COVID-19 emergency has increased the number of new rough sleepers and returners to rough sleeping coming onto the streets. This includes people who have lost employment (including EEA nationals), those fleeing domestic abuse and those with NRPF. This situation looks set to continue and may worsen as the economic impacts of COVID-19 increase. This is putting additional pressure on services and accommodation now and will continue to do so.
- 6.8. **Visibility:** Ensuring that there is visibility with external groups such as the Rough Sleeping Strategic Group who hold plans that are interdependent with the Recovery Planning Groups. The risk of duplication and/or missed

activity could undermine efforts. Health and social care services will be under considerable pressure and may need encouragement to view this work as a priority. We also need to work well to communicate with key local stakeholders – businesses, residents, council staff, Members etc. – so that the work being undertaken, the outcomes achieved and the challenges of securing an outcome for everyone is fully understood.

- 6.9. **Return of local workers:** As the gradual return to work progresses, we could see increased numbers of rough sleepers on the streets. The risk is that, when people are coming back to work, rough sleepers still living in hotels near the City may start to return to the streets and establish a street lifestyle in the City because of the opportunities for begging.
- 6.10. **Reconnection challenge:** Reconnections might be difficult, not just due to resourcing but also travel restrictions. Therefore, it is recommended that additional temporary accommodation capacity be developed to increase the planning time available for those in need of a reconnection.
- 6.11. **Budgetary risk:** Continuing to provide emergency accommodation for a second wave and predicted winter peak is likely to impact on the budget. Therefore, additional income is to be identified early to enable appropriate contingency planning.

7. Action plan based on delivery principles

7.1. The delivery and oversight of the strategic plan (see Appendix) for all boroughs will be via a central Rough Sleeping Strategic Group which will report to the Government's Taskforce on the COVID-19 Response to Rough Sleeping and Next Steps led by Dame Louise Casey. To ensure that the local City of London Recovery Plan is aligned to the broader approach, as set out by the Rough Sleeping Strategic Group, the following principles have been adopted from their strategy:

- **Principle 1:** Seek to ensure that no one who has been placed in emergency accommodation in response to the COVID-19 public health crisis is asked to leave that emergency accommodation without an ongoing offer of support to end their rough sleeping
- **Principle 2:** Ensure that there is the capacity and capability to deliver and implement In for Good offers of support
- **Principle 3:** Ensure continued protection from COVID-19 for those who need it
- **Principle 4:** Ensure that responsibility is shared fairly across London boroughs, and that none are disproportionately impacted by hosting rough sleepers from outside their boroughs
- **Principle 5:** Ensure that a London-wide approach supports and complements the efforts of individual boroughs and providers, and vice versa
- **Principle 6:** Ensure an integrated housing approach with health and care to secure access to services and continuity of care
- **Principle 7:** Ensure that the roll-out is gradual to avoid a 'cliff edge' and overload of services as lockdown is lifted
- **Principle 8 (specific to City of London):** Some rough sleepers may choose to refuse their offer of support. The City of London will work hard to prevent this but, ultimately, the public health emergency does not bestow upon the City of London the power, or the responsibility, to keep accommodating rough sleepers in emergency accommodation once an offer of support more suitable to the rough sleeper's needs and circumstances has been made and refused
- **Principle 9 (specific to City of London):** Enable the transition from recovery plans to long-term capacity development .

7.2. The following outlines the responsibilities of other key partners, as represented in the Rough Sleeping Strategic Group's May 2020 strategy paper. See Appendix 1 for full report.

Rough Sleeping Strategic Group

- Collect and disseminate good practice to local authorities and other organisations
- Escalate significant pan-London issues where there are barriers to this approach being implemented
- Work with authorities to get an agreed approach for those for whom no borough or other local authority is responsible, including developing pan-London or sub-regional responses
- Ensure that partners can share data where needed
- Work across partners, to ensure that, where specialist step-down/step-up provision is needed at a sub-regional or regional level, this is a shared responsibility
- Continue to support authorities with implementing next steps by raising issues that are not resolvable at a borough/regional level via appropriate escalation routes
- Work to seek agreement from authorities on an approach to new arising needs
- Have sight of GLA and borough plans for scheduling the move on from emergency accommodation.

GLA

- Help stagger the release of individuals from emergency accommodation by seeking to extend the availability of GLA-procured emergency accommodation beyond end of June
- Seek to increase the supply of Clearing House properties, both for those in hotels to move on to and to create capacity in hostels for those with support needs who are currently staying in hotels
- Explore other options for increasing the supply of accommodation
- Explore the scope to expand pan-London services to meet the needs of those moving on from emergency accommodation
- Provide capital funding to enable hostels to be remodelled so that residents can adhere to social distancing and social isolation guidance
- Mobilise the Life Off the Streets Taskforce to support the delivery of the strategy
- Continue to provide a hub for data through the Combined Homelessness and Information Network (CHAIN)
- Ensure that data is available to be shared with partners to support strategic decision-making on health and housing integration across London.

NHS

- Carry out prevention and screening in hotels to check for and treat blood-borne health needs
- Work with boroughs and the GLA to ensure that those who need them have health needs assessments
- Develop plans to meet the gaps in health requirements that are identified through the health needs assessment
- Deliver a health needs audit
- Work with boroughs and the GLA to ensure continuity of care as people move between services or pathways
- Explore how COVID-care provision will be continued
- Continue to provide assessment and testing of symptomatic cases, working closely with the London Coronavirus Response Cell (LCRC)
- Explore options with boroughs for joint commissioning of services where appropriate
- Work with boroughs and the GLA to ensure that plans link with local and regional NHS plans.

8. Planning Assumptions and Constraints

8.1. The following have been considered:

- Recovery Planning Group activity planned up to end of March 2021, assumed transition into business as usual and growth proposal activity will be complete by this date
- GLA continue to provide emergency accommodation until move on is secured/offered
- MHCLG/GLA will deliver on their responsibilities as outlined in section 7
- Assumed budgetary availability to cover 100% of costs
- Plans to procure new local services – assessment hub and high support hostel – will continue as planned
- Local authorities will work collaboratively to accept responsibility for rough sleepers with a local connection to their area
- Travel restrictions will be lifted gradually, enabling reconnection overseas
- PRS affordability and availability with short-term demand causing a shortage, resulting in a spike in rents
- Existing pathway accommodation is mostly shared and may not be considered safe for those who are vulnerable to COVID-19.

9. Monitoring

- 9.1. **Recovery Planning Group Chaired by Assistant Director People, Chris Pelham:** Actions and decisions are agreed and logged. Both commissioning services and homelessness services are represented on the group to ensure that activity is complementary to ‘business as usual’ activity.
- 9.2. **Measuring success:** The Recovery Planning Group will measure success against the principles outlined in section 7.
- 9.3. **Reporting:** It is recommended that quarterly reports be submitted to the Homelessness and Rough Sleeping Sub-Committee whilst the Recovery Planning Group activity remains open.

Appendices

1. ***Rough Sleeping and COVID-19: Next steps for rough sleepers in emergency accommodation in London (the Rough Sleeping Strategic Group Strategy Paper)***

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