



Homelessness and Rough Sleeping Sub Committee

Date: TUESDAY, 1 DECEMBER 2020

Time: 1.45 pm

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

Marianne Fredericks, Community and Children's Services (Chairman)	Paul Kennedy, City Church
Tijs Broeke, Police Authority Board (Deputy Chair)	Natasha Maria Cabrera Lloyd-Owen, Community and Children's Services
Randall Anderson, Chairman - Community and Children's Services	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
Alderman Alison Gowman, Court of Common Council/Police Authority Board	Henrika Priest, Community and Children's Services
Alderman Vincent Keaveny, Court of Common Council	Jillian Reid, Safer City Strategic Partnership
	Ruby Sayed, Deputy Chairman - Community and Children's Services

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Next Meeting Date: 11.00am, Monday 22 February 2021

Accessing the virtual public meeting

Members of the public can observe this virtual public meeting at the below link:

<https://youtu.be/YFfzUVo5nL0>

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. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 1 October 2020.

For Decision
(Pages 1 - 10)

4. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information
(Pages 11 - 12)

5. **MENTAL HEALTH AND ROUGH SLEEPING**

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

A presentation will be given as part of this agenda item and Committee Members are requested to read the linked report.

For Information
(Pages 13 - 16)

6. **ROUGH SLEEPING DATA Q2 2020/21**

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

For Information
(Pages 17 - 34)

7. **SEVERE WEATHER EMERGENCY PROTOCOL PLANNING 2020-21**

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

For Information
(Pages 35 - 38)

8. **SUPPORTING EUROPEAN UNION (EU) NATIONALS WITH NO RECOURSE TO PUBLIC FUNDS**

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

For Information
(Pages 39 - 46)

9. **CITY OF LONDON POLICE UPDATE**

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

For Information

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

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

12. **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

13. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 1 October 2020

For Decision
(Pages 47 - 48)

14. **CARTER LANE - TRANSITIONAL PLANNING**

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

For Information
(Pages 49 - 54)

15. **GROWTH PROGRAMME UPDATE**

The Director of Community and Children's Services to be heard.

For Information

16. **CITY OF LONDON POLICE NON-PUBLIC UPDATE**

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

For Information

17. **QUESTIONS RELATING TO THE WORK OF THE SUB-COMMITTEE WHILE THE PUBLIC ARE EXCLUDED**

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

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HOMELESSNESS AND ROUGH SLEEPING SUB COMMITTEE

Thursday, 1 October 2020

Minutes of the meeting of the Homelessness and Rough Sleeping Sub Committee held via Microsoft Teams

Present

Members:

Marianne Fredericks (Chairman)	Paul Kennedy
Tijs Broeke (Deputy Chair)	Natasha Maria Cabrera Lloyd-Owen
Randall Anderson	Alderman Bronek Masojada
Mary Durcan	Benjamin Murphy
Helen Fentimen	William Pimlott
Alderman Alison Gowman	Jillian Reid
Alderman Vincent Keaveny	

Officers:

Kirsty Lowe	- Community and Children's Services Department
Will Norman	- Community and Children's Services Department
Chris Pelham	- Community and Children's Services Department
Simon Young	- Community and Children's Services Department
Aqib Hussain	- Chamberlain's Department
Louise Said	- Chamberlain's Department
Ellen Wentworth	- Chamberlain's Department
Antoinette Duhaney	- Town Clerk's Department
Kerry Nicholls	- Town Clerk's Department
Chandni Tanna	- Town Clerk's Department
PC Jason Foster	- City of London Police
Supt. Helen Isaac	- City of London Police

Also Present:

John Isserlis	- Ministry of Housing, Communities and Local Government
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1. APOLOGIES

Apologies for absence were received from Ruby Sayed.

2. MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT

There were no declarations.

3. ELECTION OF CHAIRMAN

Members elected a Chairman in accordance with Standing Order 29.

RESOLVED, that being the only Member willing to serve, Marianne Fredericks be appointed as Chairman of the Homelessness and Rough Sleeping Sub Committee for the ensuing year.

On taking the Chair, the Chairman thanked retiring Member, Jason Pritchard, for his work on the Sub Committee and welcomed new Members, Helen Fentimen, Alderman Alison Gowman and Jillian Reid (representing the Safer City Partnership).

4. **ELECTION OF DEPUTY CHAIRMAN**

Members elected a Deputy Chairman in accordance with Standing Order 30.

RESOLVED, that being the only Member willing to serve, Tijs Broeke be appointed as Deputy Chairman of the Homelessness and Rough Sleeping Sub Committee for the ensuing year.

5. **MINUTES**

The public minutes and non-public summary of the meeting held on 29 June 2020 were approved.

With regard to Minute 9: The City of London Community Trigger Recommendations January 2020, the ASB Coordinator and Strategy Officer confirmed that the Mental Health team provided support and intervention at every level of the Community Trigger process.

RESOLVED, that the public minutes and non-public summary of the meeting held on 29 June 2020 be approved.

6. **OUTSTANDING ACTIONS**

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

- The important contribution of the British Transport Police towards homelessness was highlighted and the Police Superintendent agreed to approach the representative of British Transport Police to attend future meetings of the Sub-Committee.
- In referring to recent discussions by the Sub-Committee on the work of Beam which used crowd funding to support homeless people into stable careers, a Member asked that this be flagged as an outstanding action to consider at a future meeting.
- Going forward, relevant press releases would be circulated to the Sub-Committee by the Media Officer via the Clerk to the Sub-Committee.
- A number of outstanding actions would be discussed during the course of the meeting. Others had been completed and would be removed from the Outstanding Actions list.

RESOLVED, that outstanding actions be noted.

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

Members heard a presentation of the Senior Rough Sleeping Advisor of the Rough Sleeping Advisory Team, Ministry of Housing, Communities and Local Government.

- The City of London Corporation was working closely with the Rough Sleeping Advisory Team to deliver the Year 3 workstreams of the Rough Sleeping Initiative Funding Programme with a proposal being drafted for Year 4. The City of London Corporation had established 19 beds at the YHA during the initial stages of the Government's "Everyone In" policy and had made a successful bid for £941k from the Next Steps Accommodation Programme to build on this offer by expanding the number of beds and providing support to service users.
- The Government had recently launched a £160M capital funding programme to provide 3,500 accommodation units for homeless people and rough sleepers by 31 March 2021, and a total of 6,000 new units over 3.5 years. Due to short timescales, as well as a limitations around the availability of City accommodation and the need to spend in-year, the City of London Corporation had been unable to bid for funding for the first tranche of this programme; however, there would be further opportunities to submit bids during the programme. It was anticipated that accommodation units would be sourced in a range of ways including private sale, modular accommodation and the conversion of existing hostel or nursing home accommodation. A further London-wide initiative, Target 1000, aimed to support 850 entrenched rough sleepers via a 'No Wrong Door' bespoke offer.
- Local authorities had a duty under the Homelessness Reduction Act 2017 to prevent people from becoming homeless, including those discharged from hospital or released from prison; however, there was a concern at a possible rise in homelessness and rough sleeping following the reintroduction of the eviction process which had been suspended at the start of the COVID-19 pandemic. A Member suggested it would be helpful for the Court system to notify local authorities about upcoming eviction matters.
- European Union citizens without settled or pre-settled status would have no recourse to public funds after 31 December 2020 and local authorities would have to make their own decisions around funding any support. The Outreach Service continued to encourage European Union citizens who were homeless or rough sleepers to apply for settled status where possible, but some individuals were fearful of engagement with services and a high proportion of applicants were not successful. In discussion, Members flagged serious concerns over the impact of Brexit on European Union citizens without settled or pre-settled status and the Chairman suggested that it would be helpful to delay the recategorization of European Union citizens to no recourse to public funds during the COVID-19 pandemic.

- Homelessness statistics were measured in two ways which comprised an annual return by all local authorities and a bi-monthly return which was undertaken by areas in receipt of funding from the Rough Sleeping Initiative Funding Programme. A significantly higher number of people than previously measured had requested accommodation via the Government's "Everyone in" policy due to homelessness and this included people whose accommodation arrangements had broken down as a result of the COVID-19 pandemic. A Member observed that a number of homeless people utilised public transport as a means of staying safe and were therefore not included in the annual street counts. The Senior Rough Sleeping Advisor confirmed that a new charter had been introduced for the rail network to ensure staff engaged in a more supportive way with those identified as homeless or rough sleeping.
- A Member underlined the need to consider how support services could best be delivered for people who were homeless or rough sleeping during Christmas 2020, particularly against a backdrop of social distancing requirements and local restrictions. The Senior Rough Sleeping Advisor confirmed that work was underway with Public Health England to produce guidance on the operation of homeless shelters and services. Providers should also work with local authorities and Public Health services to ensure the homelessness support offer was safe.

The Chairman thanked the Senior Rough Sleeping Advisor for his excellent presentation.

RESOLVED, that the update be noted.

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

The Committee considered a report of the Director of Community and Children's Services in respect of rough sleeper data for end of the year 2019/20 and Quarter 1 2020/21 and the following points were made:

- The total number of rough sleepers in the City of London was 172 as at Quarter 4 2019/20 and had fallen to 140 in Q1 2020/21. This was considerably lower than the same period in 2019/20 and was also lower than the City of London Corporation's benchmark local authorities. The most common support needs of rough sleepers were those relating to mental health and/or drug or alcohol misuse. Drug and alcohol support services could be accessed via Turning Point and the Homelessness Prevention and Rough Sleeping Service was working with Public Health colleagues to develop a funding proposal to lower the threshold for accessing services.
- A Member requested that future statistical reports to the Sub-Committee include clarification on whether rough sleepers who were European Union citizens had settled or pre-settled status. The Chairman highlighted the need for a strategy to be in place to manage an increase in the numbers of rough sleepers with no recourse to public funds and

asked that a report be provided to a future meeting of Community and Children's Services Committee on this emerging issue and shared with members of the Homelessness and Rough Sleeping Sub-Committee.

- In response to a question from a Member, the Head of Homelessness Prevention and Rough Sleeping confirmed that the use of 'Flow', 'Stock', and 'Returner' to categorise rough sleepers were official categories set out by the Greater London Authority to distinguish between rough sleepers who were known or unknown to services, but that different terminology would be used in future. Another Member was concerned at the proportion of rough sleepers listed as 'flow unidentified' and the Head of Homelessness Prevention and Rough Sleeping responded that this related to the people who had not yet been assessed by the Outreach Team.

RESOLVED, that the update be noted.

9. **CREDIBLE OFFER POLICY**

The Committee considered a report of the Director of Community and Children's Services on the credible offer policy and the following point was made:

- The draft Credible Offer Policy had been designed to ensure that an equitable, effective and transparent approach was taken in the delivery of service offers to rough sleepers. In response to a question from a Member, the Head of Homelessness Prevention and Rough Sleeping advised that service users would only be offered accommodation outside Greater London where they had a strong and safe connection to a particular location or where their individual needs could only be met outside London. Service users would not be placed outside Greater London unless they agreed, and all accommodation would be considered unsafe and/or unsuitable for placement until an assessment had positively determined its safety and suitability. A Member commended officers for an excellent policy and highlighted the importance of accommodating individuals in areas where they had the opportunity to develop social capital and engage with the community.

RESOLVED, that the Community and Children's Services Committee be recommended to approve the draft Credible Offer Policy.

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

The Committee considered a report of the Director of Community and Children's Services presenting an update on the COVID-19 Recovery Plan and the following points were made:

- The programme of regular street audits had continued on a bi-monthly basis throughout the COVID-19 pandemic with an average of 14 individuals identified as rough sleeping in the City of London on any given night. A significant number of rough sleepers had been supported

into emergency accommodation with the City of London Corporation or the Greater London Authority during the pandemic.

- 37 guests were being accommodated at Carter Lane hostel where work to identify and move individuals into longer term accommodation was ongoing.
- The City of London Police was taking a four 'E's approach to COVID-19 enforcement which comprised Engage, Explain, Encourage and Enforce.

RESOLVED, that the update be noted.

11. HOMELESSNESS AND ROUGH SLEEPING - GROWTH PROGRAMME UPDATE

The Committee considered a report of the Director of Community and Children's Services on the growth programme and the following point was made:

- Longer term interventions being developed by the Commissioning and Rough Sleeping Services in conjunction with City Procurement comprised the Assessment Centre, High Support Hostel and Private Rented Sector procurement framework. Timescales to establish the Assessment Centre and High Support Hostel had been accelerated in light of the COVID-19 pandemic and work was underway to identify suitable locations.

RESOLVED, that the update be noted.

12. COMMUNITY PROTECTION NOTICES AND THE STREET POPULATION IN THE CITY OF LONDON

The Committee considered a report of the Director of Community and Children's Services presenting a report on Community Protection Notices and the street population in the City of London and the following points were made:

- Community Protection Warnings (CPWs) and Community Protection Notices (CPNs) were used to deal with ongoing anti-social behaviour problems within a community by targeting the individuals, premises and/or businesses responsible. The City of London Police was the only agency within the Square Mile to have delegated authority to issue CPWs and CPNs specifically for anti-social behaviour. Between August 2019 and August 2020, 81 CPWs and CPNs had been issued by the City of London Police, of which 32 had been for begging. The number of CPWs and CPNs issued by Operation Luscombe was very low and any individual going through the Operation Luscombe process identified as being at risk of enforcement was brought to the attention of statutory and non-statutory partners for support and intervention services.
- Whilst CPWs and CPNs could be modified to an individual's specific behaviour and circumstances and include tailored positive prohibitions, this could be difficult to secure. A Member commented that there was

often a reluctance of people to share details with the Outreach Team whilst the Police or Parkguard were present and it was important to ensure that homeless people and rough sleepers felt confident in sharing information that would enable them to access support and intervention services. The Member requested that details on the proportion of those issued with CPWs and CPNs with suspected mental health issues be provided following the meeting. The Chairman took the Member's concern on board but said that this was not an issue she had witnessed when she had been out with the Police and Parkguard.

RESOLVED, that the report be noted.

13. **CITY OF LONDON POLICE UPDATE**

a) **COMMUNITY POLICING MODEL**

The Superintendent gave an update on the Community Policing Model and the following point was made:

- The Community Policing Model would have a focus on crime prevention and would address local issues via a series of ward hubs supported by sector tasking teams. A recruitment process was underway to ensure that the model was well-staffed.

b) **OPERATION LUSCOMBE**

The Police Constable gave an update on Operation Luscombe and the following points were made:

- The City of London Police worked closely with the British Transport Police in delivering Operation Luscombe which had been recognised as a highly successful programme in reducing begging and anti-social behaviour and had continued operating throughout the COVID-19 pandemic. The Assessment Hub had been suspended for safety reasons during the COVID-19 pandemic but would be reintroduced from 21 October 2020.
- A Member queried whether there was any way of tracking rough sleepers who moved to new areas rather than into support services and the Police Constable explained that this was difficult to monitor as such individuals were unlikely to engage with local services. Another Member underlined the importance of data sharing at a national level to support the provision of consistent support.
- The Mental Health Street Triage service carried out mental health assessments of homeless and rough sleeping people where concerns were identified by the Police. A Member requested that a report on mental health and homelessness, including support and intervention strategies be provided to future meetings of the Homelessness and Rough Sleeping Sub-Committee and the Health and Wellbeing Board.

- The Chairman underlined the importance of ensuring that homeless people and rough sleepers had access to face masks and antibacterial hand gel during the COVID-19 pandemic and noted that without a mask, individuals would not be able to access a range of services including local shops and medical care.

RESOLVED, that the updates be noted.

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

There was one question raised

The Chairman noted the need to ensure the Sub-Committee had the necessary skills sets to deliver its planned work programme. Another Member suggested that consideration be given to inviting an external Member with relevant experience to join the Sub-Committee.

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

Two items of other business were considered.

The Chairman led the Sub-Committee in paying tribute to Isaura Abbas who was retiring after many years of managing The Lodge which was an exemplary provision for homeless people and had supported many people out of homelessness.

Thames Reach would take over from St Mungo's as the City of London Corporation's provider of outreach services for homeless people and rough sleepers from 1 November 2020. The Chairman led the Sub-Committee in thanking St Mungo's for its excellent service over many years.

16. 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
17	3
18	1, 2 and 3
19	3
20	3

17. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 29 June 2020 be approved.

18. CITY OF LONDON POLICE NON-PUBLIC UPDATE

a) BEST PRACTICE APPROACHES

The Police Constable gave an update on best practice approaches.

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

There were three questions raised.

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

One matter was raised while the public were excluded.

The meeting closed at 1.50 pm

Chairman

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Homelessness and Rough Sleeping Sub Committee – Outstanding Actions
October 2020 update

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			
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			
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)	Added to work programme.
1 October 2020			
10/20/HRS	6. Outstanding Actions	The work of Beam to be considered at a future meeting of the Sub-Committee.	Added to work programme.
11/20/HRS	8. Rough Sleeper Data – End of Year 2019/20 and Q1 2020/21	Future statistical reports to the Sub-Committee to include clarification on whether rough sleepers who were European Union citizens had settled or pre-settled status and to use different terminology to 'Flow', 'Stock' and 'Returner'.	Future approach to this discussed with the Chairman.

Action Number	Agenda Item	Action	Progress Update
12/20/HRS	12. Community Protection Notices and the Street Population in the City of London	Information on the proportion of homeless people or rough sleepers issued with CPWs and CPNs who had or were suspected of having mental health support needs to be provided to Members following the meeting.	To be actioned (CoLP)
14/20/HRS	14. Questions on Matters Relating to the Work of the Committee	Members to consider the whether the Sub-Committee had the necessary skills sets to deliver its planned work programme and consideration be given to inviting an external Member with relevant experience to join the Sub-Committee.	For consideration by Members.
15/20/HRS	17. Non-Public Minutes	The findings of an informal report on a recent adult safeguarding incident to be reported to a future meeting of the Sub-Committee.	Added to work programme.
16/20/HRS	19. Non-Public Questions	The Chairman to hold an informal brainstorming session in late 2020 or early 2021 to consider how homelessness and rough sleeping services could best be promoted going forwards.	To be actioned.

Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	01/12/2020
Subject:	Public
Mental Health and Rough Sleeping	
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2, 3, 4
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	For Information
Andrew Carter, Director of Community and Children's Services	
Report author:	
Kirsty Lowe, Rough Sleeping Service Manager, Department of Community and Children's Services	

Summary

This report presents the mental health support needs of the City of London's (CoL's) rough sleeping community and how the Rough Sleeping and Mental Health Programme (RAMHP) has already made significant improvements to the health and wellbeing of CoL rough sleepers.

The RAMHP works closely with the CoL Outreach team, supporting a personalised response to rough sleepers with the aim to increase the number of individuals engaged with health and wellbeing services.

Recommendation

The Committee is asked to note the report.

Main Report

Background

1. Mental health is the most prevalent support need among CoL rough sleepers and has been the highest recorded support need over the past five years. The Combined Homelessness and Information Network (CHAIN) Annual Reports from 2015–2020 show a consistent number of CoL rough sleepers who have been assessed by homelessness services as having a mental health support need, averaging 56%. This percentage is a mix of known mental health diagnosis, self-disclosure and worker's assessment of someone's needs.

2. In 2019/20, 55% of rough sleepers were recorded as having a mental health support need. Further to this, 45% of assessed CoL rough sleepers in 2019/20 were identified as having both substance and mental health support needs.
3. To date 2020/21 CHAIN data shows a similar figure of 57% of CoL rough sleepers recorded as having a mental health support need.
4. Prior to March 2020, the CoL's mental health provision consisted of a practitioner nurse through the East London NHS Foundation Trust (ELFT). The practitioner nurse was a shared resource, and so scope to support the CoL Outreach team was limited. The nurse attended one joint shift a week with the CoL Outreach team, providing professional guidance and support and carrying a small caseload. The nurse's time focused on identifying individuals who required a Mental Health Act assessment and sectioning. The practitioner nurse is now part of the new RAMHP team where their expertise and knowledge of the CoL and CoL rough sleepers can be shared.
5. Over the past five years, CoL has witnessed a consistently high number of CoL rough sleepers in need of mental health intervention. In 2017/18 CoL through a spot purchasing arrangement commissioned the Enabling Assessment Service London (EASL) to provide mental state assessments to rough sleepers who were initially engaged through the CoL Pop-up Hubs. EASL were an additional resource to the work being carried out by ELFT. EASL were able to guide outreach workers and provide a qualified assessment of a client's behaviour and confirm whether this was linked to a person's mental health. In several cases these assessments confirmed the outreach workers' concerns, leading to further mental health intervention for individuals.
6. The work carried out by EASL was particularly valuable to the CoL's Homelessness team as it provided evidence of the need for more access to lower-threshold health services for rough sleepers.

Current Position

7. The RAMHP is a Greater London Authority (GLA) funded two-year pilot programme, which began in March 2020.
8. There are four London RAMHP teams who work directly with local authority outreach teams. The ELFT provides the RAMHP in a consortium serving CoL, and the London Boroughs of Hackney, Tower Hamlets and Newham.
9. The RAMHP connects the mental health sector and homelessness sector by supporting outreach workers to engage rough sleepers to come off the streets, support individuals to navigate the health system and ultimately increase rough sleepers' engagement with mental health services.
10. The East London RAMHP team consists of a full-time manager, three full-time practitioners, and one practitioner and one consultant who both work one day a week. There is a varied skill set within the team, including social workers, nurses and occupational therapists.

11. Partnership work is key to the success of the project. The RAMHP works closely with the City Outreach team and CoL homelessness officers attending the quarterly Rough Sleeping Strategy meeting and fortnightly CoL Task and Action meetings.
12. The programme is holistic, person-centred and guided by people with lived experience of sleeping rough and having mental health needs. The RAMHP's Co-design Advisory Group of experts by experience will influence at a service and programme level throughout the pilot.
13. The RAMHP promotes a culture of learning and improving. A Community of Practice will be developed by and for the RAMHP team members, giving them a space to share their experiences from the four different regions, and to encourage best practice.

Key Data

14. In 2019/20 the ELFT practitioner nurse had a caseload of 20 rough sleepers and carried out 46 joint shifts with the CoL Outreach team. As part of the COVID-19 response, the nurse also provided all physical and mental health triage assessments for all CoL clients accommodated in the GLA emergency hotel accommodation.
15. The RAMHP has assisted a total of 45 CoL rough sleepers since March 2020. The RAMHP is currently working with 33 CoL rough sleepers: 12 have been discharged, meaning that these individuals have either been referred on to another health service or have left the East London area.
16. The RAMHP has performed well against their commissioned targets and recently reported that they have achieved or exceeded all their key performance indicators:
 - 75% of referred clients are assessed within 28 days
 - 90% of clients have a care plan complete
 - 50% of clients have accessed and maintained accommodation after discharge from the service
 - 90% of clients experience an improvement in their health and wellbeing at the point of discharge.

Corporate & Strategic Implications

17. There are no strategic or financial implications directly related to this report.

Conclusion

18. The ELFT has worked alongside the CoL Outreach team to provide a service to CoL rough sleepers for more than five years. More recently, this has been provided through the new RAMHP. In this time, the RAMHP has mobilised a fully

operational team, and has integrated well with CoL homelessness support services, and is already making a positive impact on the lives and wellbeing of many CoL rough sleepers.

Appendices

- None

Kirsty Lowe

Rough Sleeping Service Manager
Department of Community and Children's Services

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Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	01/12/2020
Subject: Rough Sleeping Data Q2 2020/21	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 1, 1, 2, 2, 3, 3, 4, 4, 11
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Simon Young, Rough Sleeping Co-ordinator	

Summary

This report presents data and brief narrative related to rough sleeping within the City of London (CoL) during the quarter 2 (Q2) period July to September 2020/21. The report reflects on a general reduction in the number of rough sleepers seen during the period, as well as an increase in the number of longer-term accommodation outcomes. Some context is provided in relation to previous rough sleeping levels, accommodation outcomes, and the overall change in service delivery related to the impact of the COVID-19 pandemic.

Recommendation

The Committee is asked to note the report.

Main Report

Background

1. The Q1 period April to June 2020/21 saw particularly high levels of rough sleeper placement into accommodation. This was predominantly emergency accommodation in response to the COVID-19 pandemic.
2. Rough sleeping in Q1 2020/21 decreased in the CoL to 140, down from 172 in the previous three months, (Q4 period January to March 2019/20).
3. The rate of reduction in rough sleeping figures within the CoL is higher than other boroughs in close geographical proximity to the Square Mile.

Current Position

4. We have seen a reduction in the number of rough sleepers in the CoL during Q2 2020/21, from 140 in Q1 to 105. A decrease in the number of rough sleepers moving into the authority area to secure offers of accommodation to isolate from COVID-19 has been attributed as a driving reason for this.
5. The reduction from the same quarter in the previous financial year is 42%, having fallen from 181 individuals in Q2 2019/20.
6. New rough sleepers seen within the authority area decreased from the first quarter, falling from 46 individuals to 21. The decrease from Q2 in the previous year is higher still, representing a decrease of 75% from 60 to 21 people.
7. During this period, the Outreach team reflected that they engaged with a high number of new rough sleepers who did not engage in offers. This indicated that a number of those seen for the first time in the CoL may be long-term rough sleepers who are known to other authorities and reluctant to accept service offers.
8. Rough sleepers with fluctuating rough sleeping patterns also decreased in the period, having represented the highest proportion of rough sleepers through Q1. This mirrors qualitative understanding of rough sleeping seen during the initial phase of our COVID-19 response, where it had been noted that a high number of rough sleepers who had not been seen anywhere in London for some time returned to rough sleeping in prominent areas. This is either due to loss of accommodation or through a desire to accept previously rejected offers of support. After Q1 it was noted that fewer individuals were reporting that they had lost accommodation, and a significantly lower number of individuals were reported as having returned to the City to access emergency provision.
9. There was a rise in the number of individuals seen as living on the streets during this period. It has been noted that, through both Q1 and Q2, a number of individuals rejecting support were consistently seen in the CoL. Often this has been outright rejection of any engagement, resulting in a high proportion of unknown individuals within the 'Living on the Streets' cohort. The Outreach team continued to offer accommodation to all individuals living on the streets, including this cohort. Over time we are seeing an increase in acceptances of these offers. We are also seeing an increase in statutory interventions from partner agencies to ensure that individuals with support needs affecting their decisions receive the right support to move away from rough sleeping.
10. There was a significant decrease in the number of accommodation outcomes recorded during the period, having fallen from 136 outcomes affecting 101 individuals in Q1 to 46 outcomes affecting 37 individuals in Q2. This has occurred due to fewer individuals entering the authority area with need of accommodation. The outcome is also related to the number of individuals with longer-term street attachments who continued to reject offers. It is of note,

however, that there was a significant increase in the number of outcomes into long-term accommodation provision.

11. The increase in outcomes to longer-term provision directly correlates with the second phase of the response to COVID-19, transitioning from the need to offer emergency accommodation to a significant number of individuals, to ensuring that those who have come into accommodation do not need to return to rough sleeping.
12. This approach has also ensured that emergency bed spaces have consistently been available within the emergency pathway, ensuring that off-the-street offers can continue as part of the CoL's ongoing commitment to the 'Everyone In' principle.
13. There were three supported reconnections to an area of local connection through Q2, an increase from Q1. All three individuals had specifically asked services for support to return to their home areas, with two individuals returning to another country where they were able to access accommodation and support from friends and family. All three individuals had been supported into emergency accommodation by services ahead of return to their home area.

Proposals

14. There are no proposals arising from this paper.

Options

15. There are no additional options arising from this paper.

Key Data

16. Key data is included in Appendix 1 of this paper, in the form of a reporting dashboard amalgamating data recorded and reported through the Pan-London rough sleeping database, Combined Homelessness and Information Network (CHAIN).

Corporate & Strategic Implications

17. There are no strategic or financial implication directly related to this report

Conclusion

18. Rough sleeping has reduced significantly within the quarter, continuing the trend from the first quarter of the financial year. An overall reduction from the same quarter in the previous year of 40% represents a high rate of reduction.
19. The 'Living on the Streets' cohort remains high, with a number of individuals refusing all offers of support from services. Activity during the period and

through subsequent quarters is focussed on restating offers of emergency support to this cohort, as well as increasing engagement from partner agencies with those who would benefit from enhanced levels of statutory intervention.

20. Activity during the quarter remains high, with individuals receiving support to move out of emergency accommodation and into longer term placements, including individuals returning to vital support networks.

Appendices

- Quarter 2 2020/21 City of London Rough Sleeping Report Dashboard

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Quarter 2 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 (CoL) for the second quarter (Q2) of 2020/21 – with background information on the year 2019/20.
- For the purpose of this report, the definitions of the three categories of rough sleepers considered are described 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’.

*‘Flow, stock and returners’ is not CoL terminology but is used by the Greater London Authority (GLA) and is how work carried out by outreach teams is recorded on the Combined Homelessness and Information Network (CHAIN) database. CoL will refrain from using this terminology in CoL narrative reports.

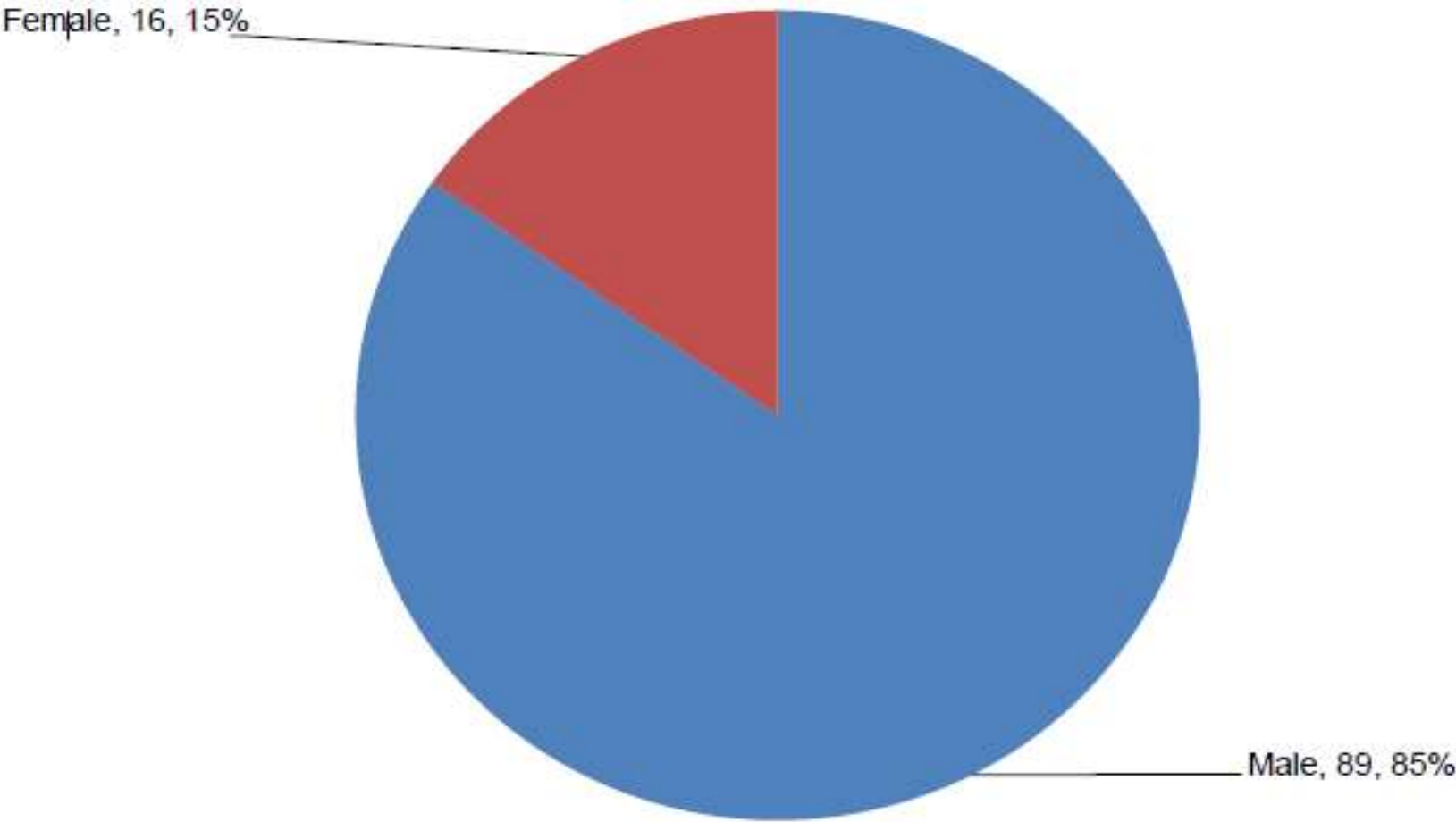
Number of rough sleepers – comparing quarterly trends

	2019/20				2020/21		% change from previous quarter
Local Authority	Q1	Q2	Q3	Q4	Q1	Q2	
City of London	174	181	145	172	140	105	-25%
Southwark	142	195	201	197	221	145	-34%
Tower Hamlets	137	190	127	137	155	111	-28%
Camden	183	265	235	242	239	170	-29%
Westminster	888	1097	768	834	710	900	27%
Greater London	3172	3985	3637	3692	4227	3444	-19%

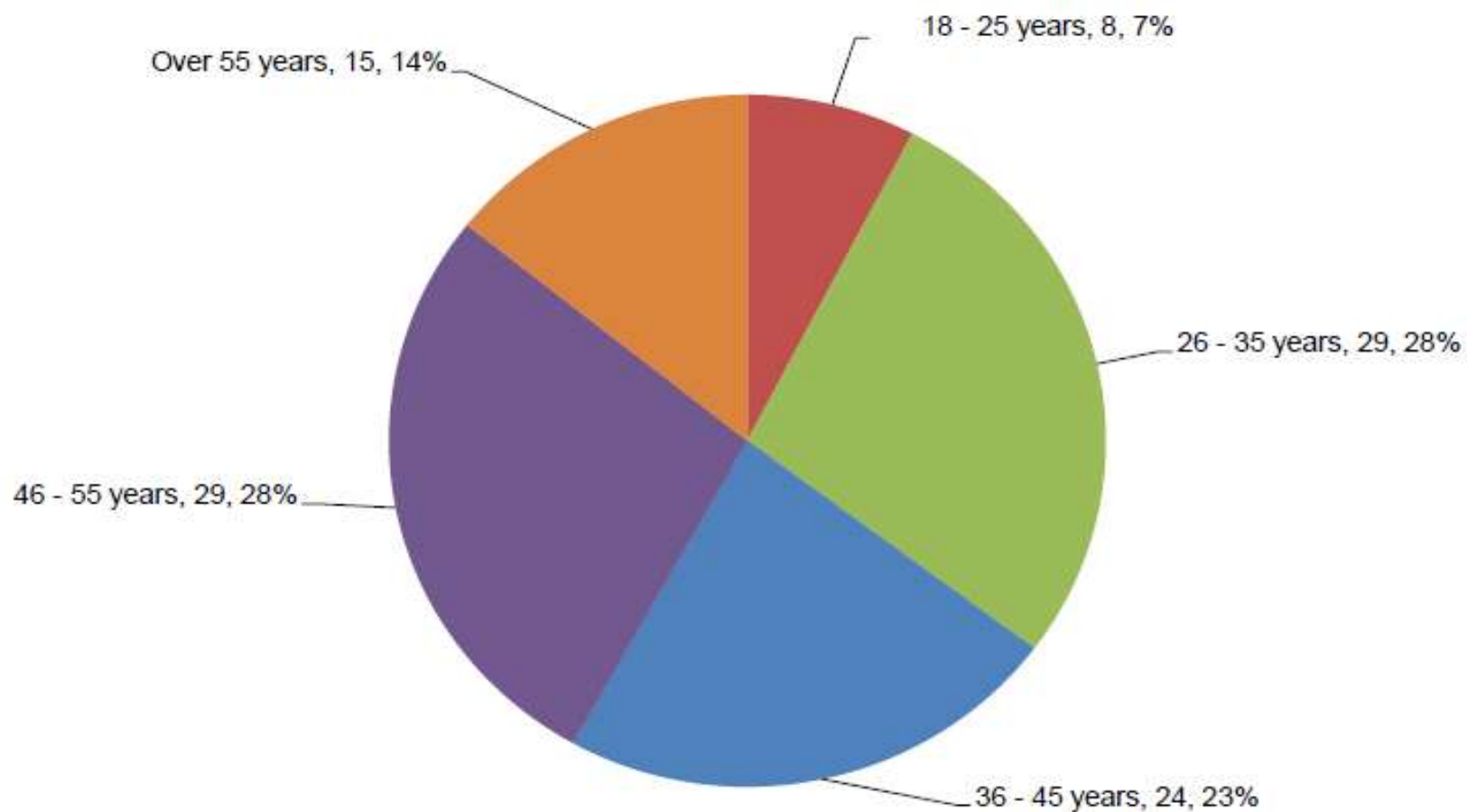
Composition of rough sleepers in Q2 2020/21

	New rough sleepers	New Rough Sleepers – Joined living on the streets (LOS)	Intermittent Rough Sleepers (returner)	LOS (All) Longer Term	LOS – RS205+ (entrenched)	Total
City of London	21	4	48	40	9	105
Southwark	67	2	55	25	3	145
Tower Hamlets	46	1	53	13	2	111
Camden	64	0	96	10	3	170
Westminster	434	10	356	120	16	900
Greater London	1901	32	1239	336	40	3444

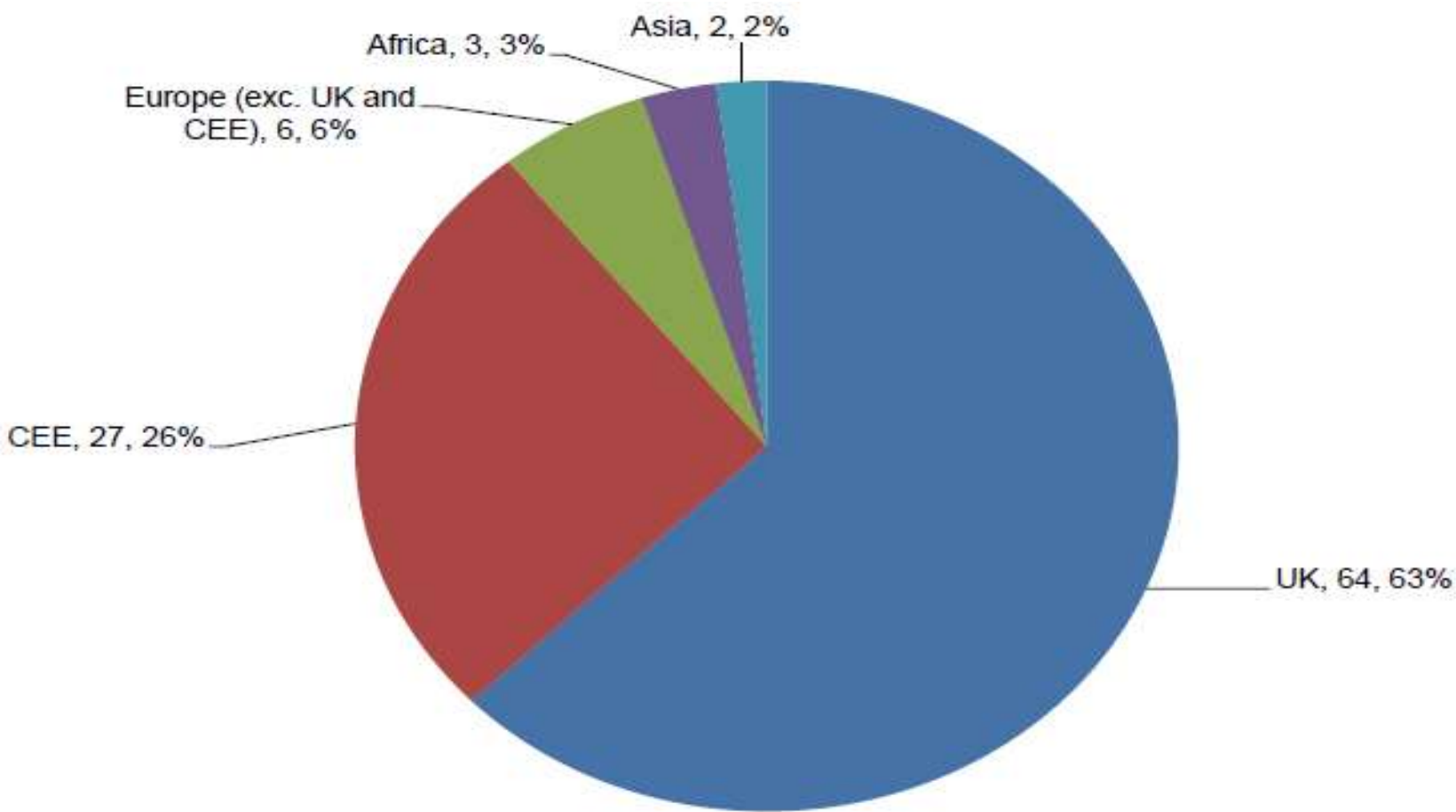
Gender – Q2 2020/21



Age – Q2 2020/21

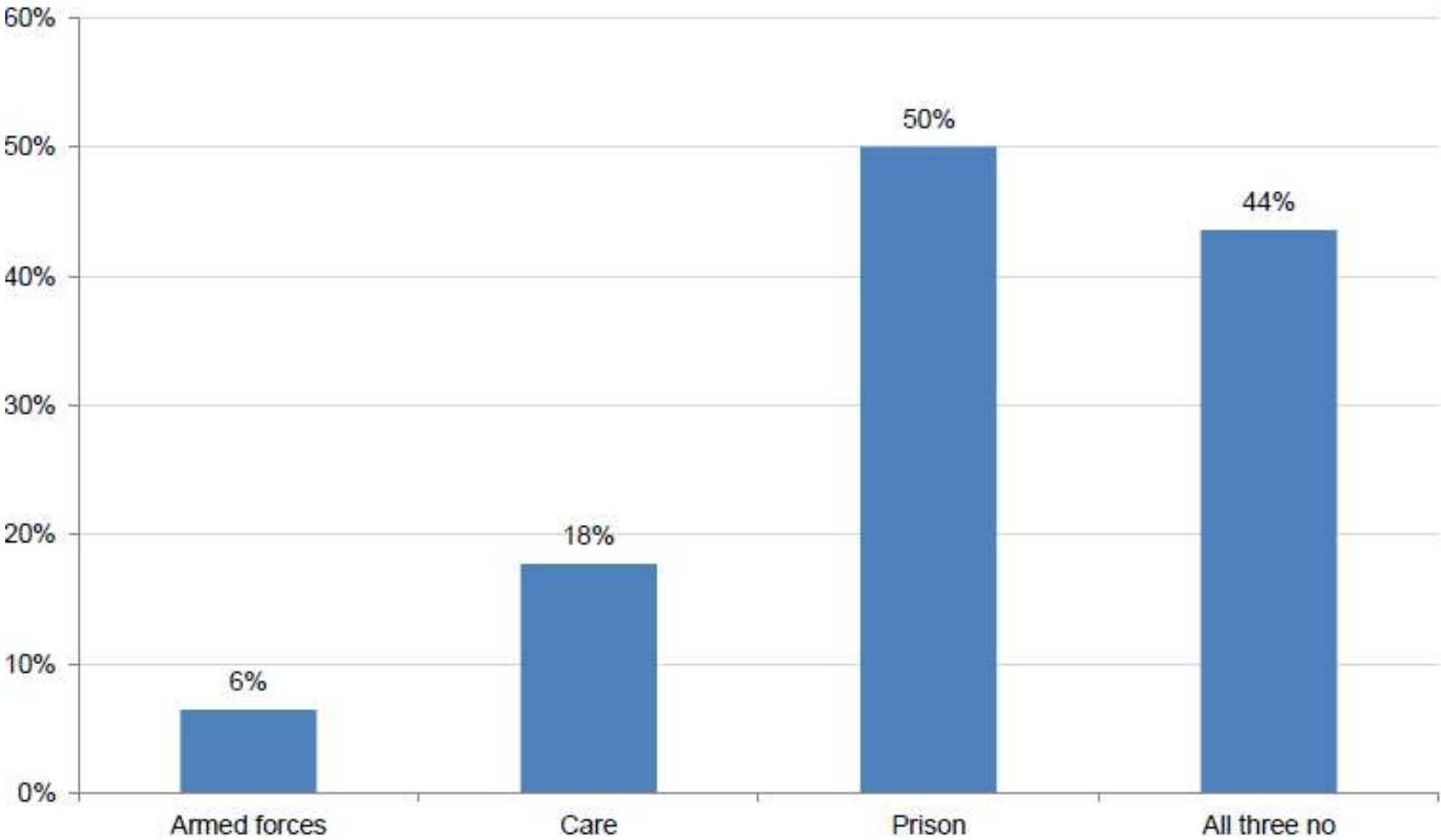


Nationality of COL rough sleepers during Q2 2020/21

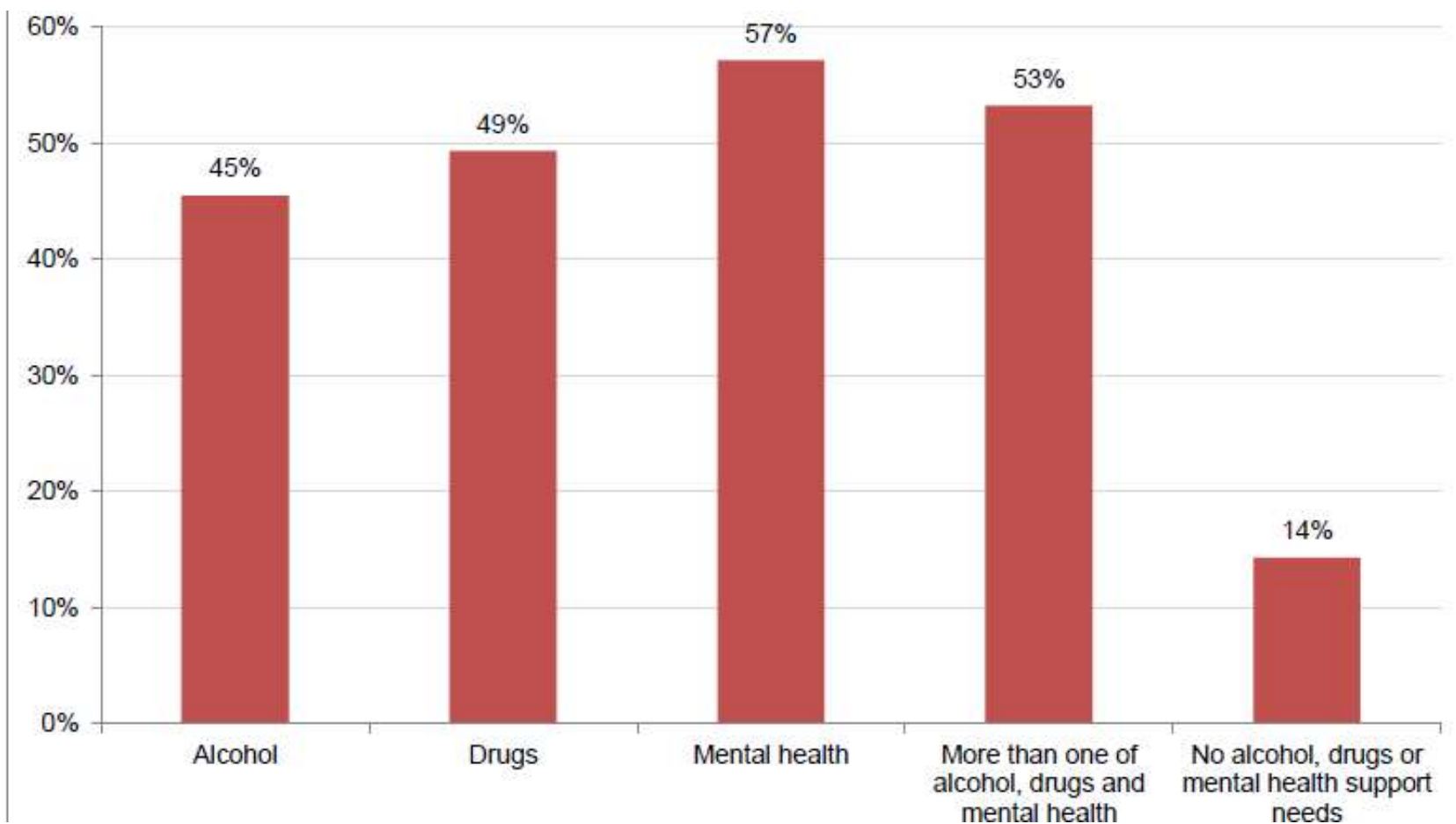




Institutional & Armed Forces History – Q2 2020/21



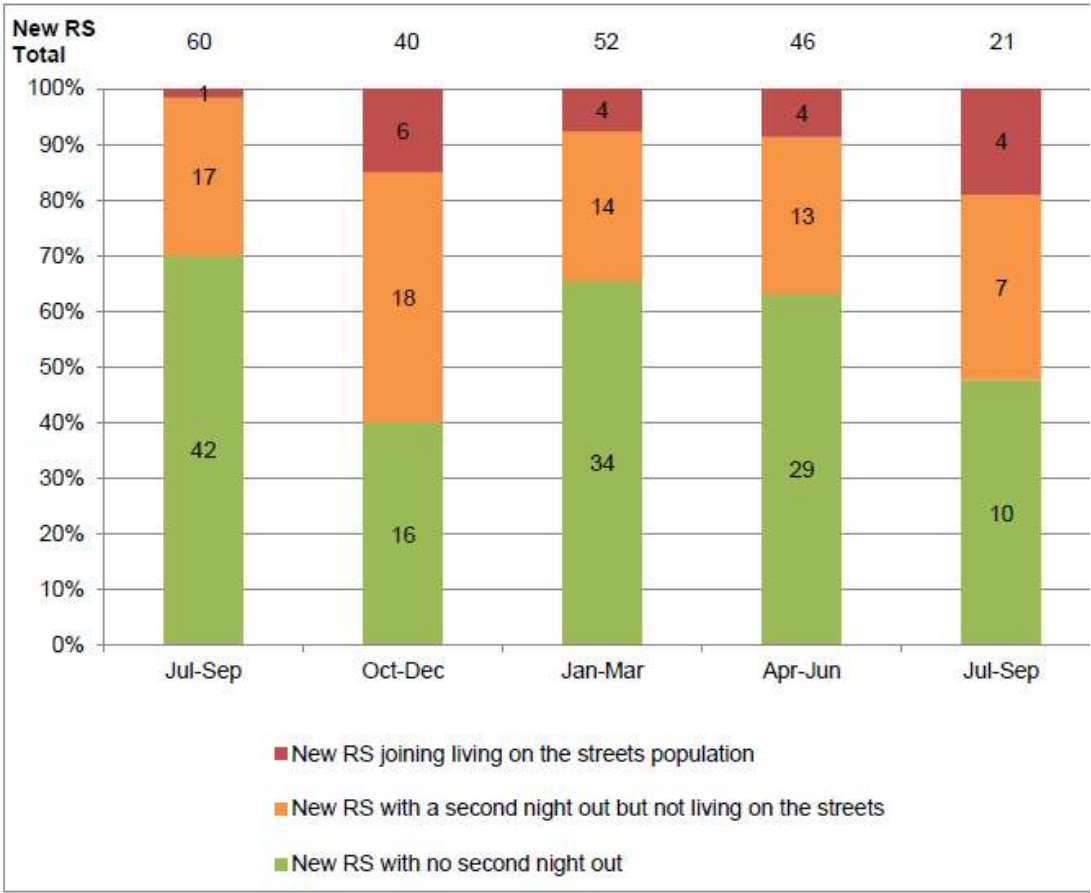
Support needs of people sleeping rough Q2 2020/21





New rough sleepers (Flow)

	2015/16	2016/17	2017/18	2018/19	2019/20	Q1 2020/21	Q2 2020/21	DOT
City of London	51.10%	52.80%	35.10%	47.80%	47.23%	32.85%	20.00%	↓
Greater London	65.20%	62.80%	59.50%	62.40%	65.75%	63.11%	55.19%	↓



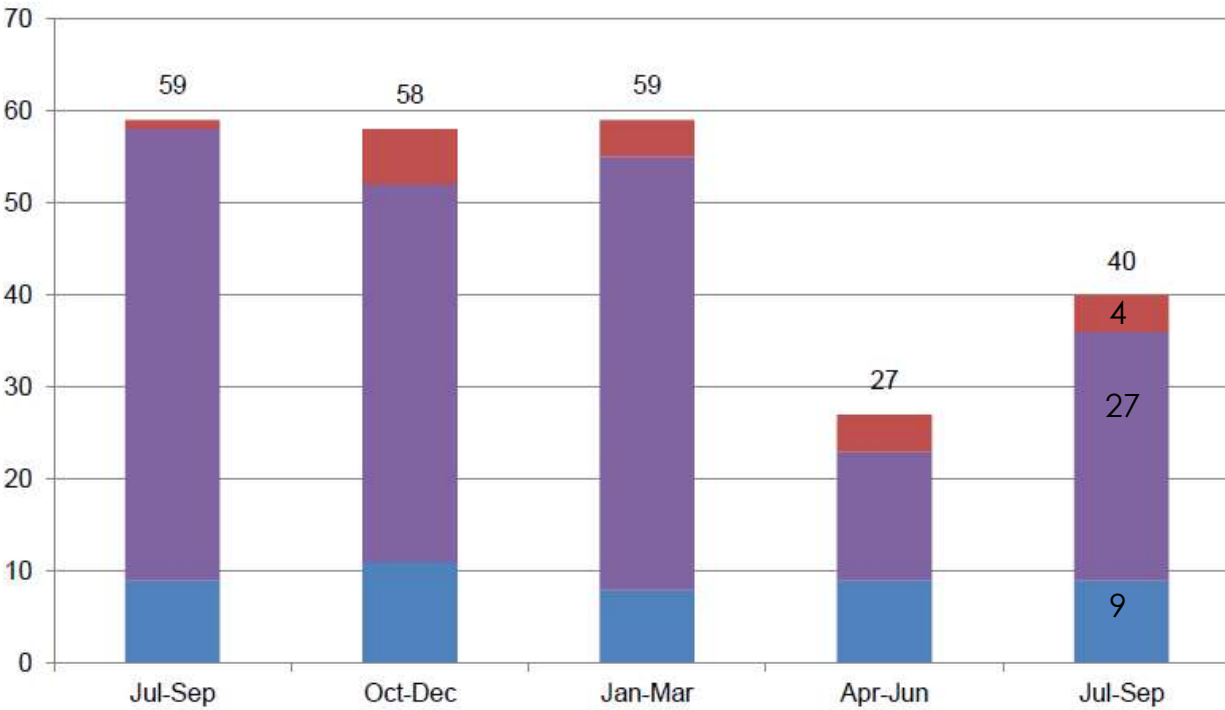
Percentage of new rough sleepers not spending a second night out (NSNO)

	2019/20				2020/21		
	Q1	Q2	Q3	Q4	Q1	Q2	Direction of travel (DOT)
City of London	63%	70%	40%	65%	63%	48%	↓
Southwark	70%	71%	77%	74%	62%	72%	↑
Tower Hamlets	84%	79%	42%	76%	81%	70%	↓
Camden	75%	74%	74%	66%	68%	81%	↑
Westminster	77%	87%	82%	87%	75%	72%	↔
Greater London	80%	80%	77%	79%	81%	77%	↔



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

	2015/16	2016/17	2017/18	2018/19	2019/20	Q1 2020/21	Q2 2020/21	DOT
City of London	35.90%	34.00%	48.30%	37.40%	32.48%	19.28%	38.09%	↑
Greater London	22.60%	24.40%	25.50%	23.50%	22.16%	6.24%	9.75%	↑

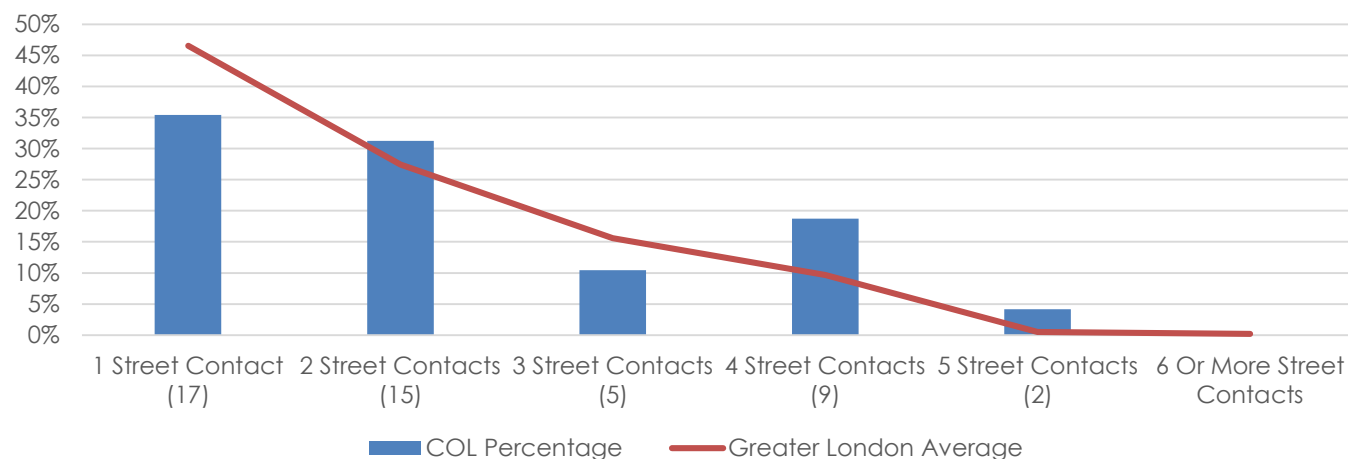




Intermittent rough sleepers (Returners)

Intermittent/Returners	2019/20				2020/21		Direction of Travel
	Q1	Q2	Q3	Q4	Q1	Q2	
City of London	63	63	53	65	71	48	↘
Southwark	65	89	71	80	81	55	↘
Tower Hamlets	54	87	63	72	67	53	↘
Camden	97	129	125	125	98	96	↔
Westminster	311	355	332	360	297	356	↑
Greater London	1298	1504	1489	1495	1322	1239	↓

Number of bedded-down street contacts
Q2 2020/21



Quarterly accommodation stays

Accommodation	No. of stays						% share					
	2019/20				2020/21		2019/20				2020/21	
	Q1	Q2	Q3	Q4	Q1	Q2	Q1	Q2	Q3	Q4	Q1	Q2
City Assessment Hubs	22	13	9	5	0	0	47%	32%	19%	7%	0%	0%
Bed & breakfast	11	8	9	6	2	1	23%	20%	19%	8%	1%	2%
Clinic/detox/rehab	0	0	0	0	0	0	0%	0%	0%	0%	0%	0%
COVID-19 Emergency Accommodation (Local)	0	0	0	18	58	28	0%	0%	0%	25%	43%	61%
COVID-19 Emergency Accommodation (Pan-London)	0	0	0	8	63	0	0%	0%	0%	11%	46%	0%
Hostel	5	3	7	8	8	7	11%	7%	15%	11%	6%	15%
Long-term accommodation	1	3	2	2	3	5	2%	7%	4%	3%	2%	11%
No second night out	0	0	0	0	0	0	0%	0%	0%	0%	0%	0
Temporary accommodation (local authority)	6	12	4	7	0	0	13%	29%	9%	10%	0%	0
Severe Weather Emergency Protocol (SWEP) (Local)	0	0	1	1	0	0	0%	0%	2%	1%	0%	0
SWEP (Pan-London)	0	0	0	0	0	0	0%	0%	0%	0%	0%	0
Winter/Night Shelter	2	1	7	0	0	0	4%	2%	15%	0%	0%	0
Total Stay	47	40	39	55	136	46	47	40	39	55	136	46

Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	01/12/2020
Subject: Severe Weather Emergency Protocol planning 2020-21	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
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 sets out the City of London's updated Severe Weather Emergency Protocol (SWEP) for the winter of 2020/21. Our planning for this winter considers Government, Public Health England and City and Hackney Public Health guidance on the provision of emergency accommodation and shared air spaces. As in previous years, we intend to use existing supported provision, as well as hotel rooms to provide additional flexible capacity.

Recommendation

The Committee is asked to note the report.

Main Report

Background

1. The City of London provides SWEP accommodation every winter, usually covering the months of November to March. The degree of use is determined by the severity of the weather (the number of activations) and the level of demand from the rough sleeping population at the time.
2. The Greater London Authority (GLA) publishes SWEP guidance every year, which sets out the expectations of local authorities and clarifies any changes to SWEP criteria or activation protocols. Each autumn we submit our SWEP plans, including the capacity and composition of SWEP accommodation, to the GLA.

3. Every preceding year the GLA has complemented local SWEP arrangements with a Pan-London SWEP project. Details have not been published for Pan-London SWEP at the time of writing this report.
4. As with last year, SWEP 2020/21 will be activated whenever the forecast temperature is expected to drop below zero centigrade in any London local authority area. Activation rests with GLA officers who instruct homelessness leads in each authority. Local authorities retain the right to activate SWEP unilaterally at their own discretion.

Current Position

5. COVID-19 has seen City of London resources deployed in different ways and has forced a change to the planning we would normally have in place at this time. The City Assessment Service at Carter Lane has, at the time of writing, 43 guests. We have a further 10 rough sleepers accommodated in hotels, and several more in supported accommodation and temporary accommodation – all part of our response to the pandemic.
6. Rough sleeping levels are currently lower than we have seen in recent years – largely due to the success of our COVID-19 contingency measures. Night-time street audit, or snapshot figures, indicate an approximate 50% reduction from the same period in 2019/20. On 26 October, 23 rough sleepers were recorded bedded down. Quarterly data for the number of unique individuals contacted demonstrates a similar fall – a 41% reduction between Q2 2019/20 (181) to Q2 2020/21 (105).
7. Our commissioned outreach service – Thames Reach, and other commissioned accommodation services are using a triage system designed to ensure that symptomatic and clinically vulnerable people do not inadvertently mix. All our residential settings are working to a standard operating procedure drafted in collaboration with local public health consultants.
8. This guidance and the subsequent measures applied have rendered some of the settings we have used previously as unsuitable – for example, the City Lodge, which is home to too many elderly, frail and clinically vulnerable people.

Changes due to COVID-19 restrictions

9. Shared air and communal living spaces are also difficult to deploy. Last winter saw the City mobilise the first Winter Programme at St Katharine Cree. That same provision this year is impossible to use, although no capacity has been lost due to the creation of the Carter Lane service.
10. Great Guildford Street Hostel (St Mungos), which has been used in previous winters, will operate with a reduced SWEP capacity this year due to difficulties in ensuring that the building is COVID-19 compliant.
11. Last winter saw the introduction of Tier 2 SWEP at St Mary Aldermary. This additional provision allowed us to significantly increase our SWEP capacity

should severe weather endure, and our existing offer become depleted. Use of shared air spaces with proper ventilation and access to bathrooms and toilets has become impossible. Tier 2 SWEP has been suspended for this winter.

Current plans

12. At time of writing, the City of London SWEP provision for 2020/21 is as follows:

- Crimscott St Hostel (Providence Row Housing Association) – two spaces in supported accommodation
- Carter Lane (Providence Row Housing Association) – two to five bedrooms depending on capacity at the service at the time
- Great Guildford Street Hostel – one bedroom
- Pre-booked hotel rooms – as many as required.

Corporate & Strategic Implications

13. There are no strategic or financial implications. All costs are covered within the local risk area.

Conclusion

14. Despite directing many of our available resources to support our COVID-19 response, the substantive City SWEP offer for 2020/21 is comparable to previous winters. Where some provision has been lost, Carter Lane provides an alternative.

15. Tier 2 SWEP is not available to us due to COVID-19 restrictions; however, hotel capacity offers us a compliant and flexible option.

16. Our SWEP offer for winter 2020/21 is comparable in capacity and diversity to previous years.

Appendices

- None

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Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	01/12/2020
Subject: Supporting European Union (EU) nationals with No Recourse to Public Funds	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
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 identifies the impact of EU Exit on rough sleeping in the City of London from 31 January 2020. It considers the implications for individuals affected by the EU Exit, particularly European Economic Area (EEA) nationals, while also considering any financial impact for the Corporation and individuals.

The report highlights the possibility of seeing increasing rough sleeping among EEA nationals in the City of London as a result of the EU Exit, and describes the support provided so far to prevent this.

A recommended course of action is provided which focuses on extending our current approach to supported reconnection. We also consider how to assist the small number of individuals with acute and life-threatening conditions who are also without recourse to public funds.

Recommendation

The Committee is requested to recommend the Community and Children's Services Committee agree the suggested course of action.

Main Report

Background

Key dates

1 December 2020	Changes to the Immigration Act come into effect
31 December 2020	UK formally leaves the EU – end of implementation period
31 December 2020	New arrivals after this date will no longer have access to the EU Settlement Scheme (EUSS).
1 January 2021	New arrivals from the EU will have no recourse to public funds.
30 June 2021	Deadline to apply for EUSS for those who arrived prior to 31 December 2020.
1 July 2021	EU nationals who have failed to register for the EUSS or who arrived in the UK after 31 January 2021 will have no recourse to public funds.

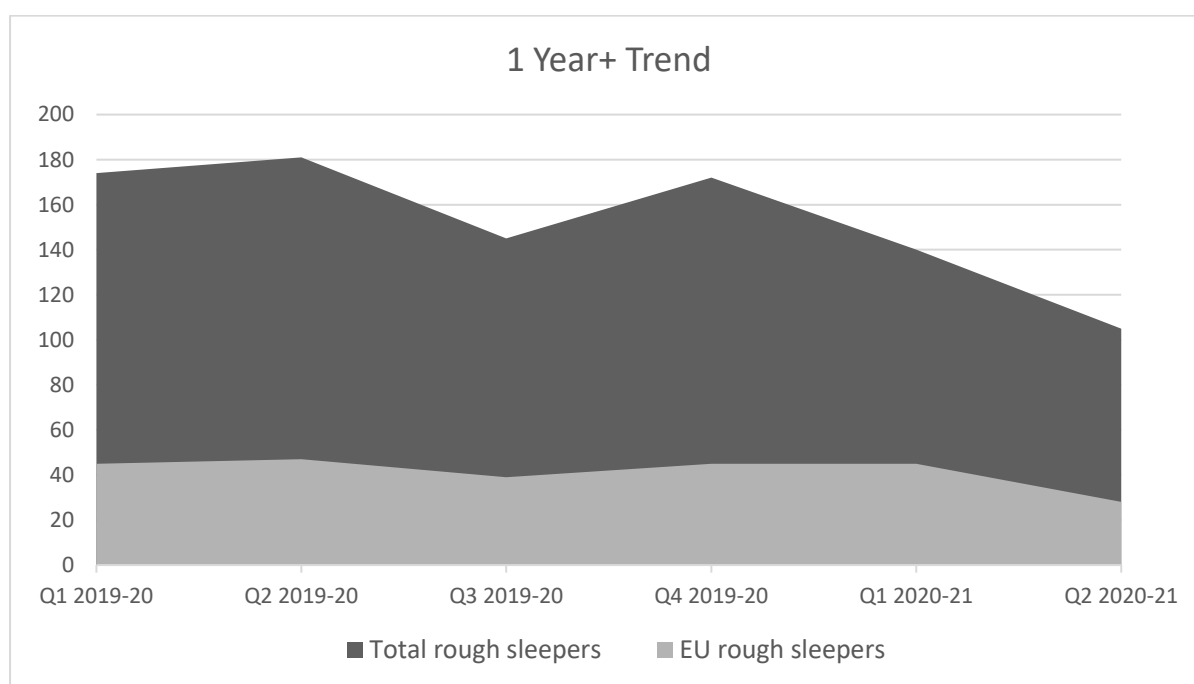
1. On 29 March 2019, the Government introduced the EUSS as a tool to maintain EEA nationals' rights to reside in the UK post the EU Exit.
2. The deadline to apply to the EUSS is 30 June 2021 for anyone who arrived in the UK before 31 December 2020. Anyone who has not applied to the EUSS by this date risks being considered 'unlawfully present in the UK' and therefore ineligible for housing assistance, welfare benefits, employment and free healthcare.
3. Arrivals to the UK from the EEA after 31 December 2020 will not be eligible for the EUSS and will therefore have no recourse to public funds.
4. On 31 January 2020, the UK formally left the EU. From 1 February 2020, the UK entered into an implementation period due to end on 31 December 2020. During this time, British citizens and EEA nationals in the UK will continue to enjoy free movement and will retain a right to reside in all member states.
5. Throughout the implementation period, the eligibility criteria for EEA nationals seeking housing assistance and welfare benefits is unlikely to change for anyone who has successfully applied to the EUSS for Pre-Settled or Settled status. The eligibility criteria is also unlikely to change for those who have not successfully applied to the Scheme; however, they must be encouraged to apply as soon as possible to avoid losing their right to welfare benefits and housing assistance from 1 January 2021 onwards. The Scheme remains open until 30 June 2021 for EEA nationals resident in the UK before 31 December 2020.
6. Any EEA nationals arriving in the UK from 1 January 2021 are likely to be subject to the new immigration rules stating that all EEA nationals (excluding Irish nationals) will require a visa to live and work in the UK.

Current Position

7. The table and graph below show the number of EEA rough sleepers as a proportion of total rough sleepers across the previous six quarters.

8. Quarter on quarter, total rough sleeping numbers have been in overall decline in the period. Numbers of EEA rough sleepers have remained relatively stable, with a noticeable reduction in the most recent period.
9. It should be noted that an individual can be counted in consecutive or more than one quarter, so the data below should be viewed as trend information only.

	Total rough sleepers	EU rough sleepers	EU as %
Q1 2019/20	174	45	26%
Q2 2019/20	181	47	26%
Q3 2019/20	145	39	27%
Q4 2019/20	172	45	26%
Q1 2020/21	140	45	32%
Q2 2020/21	105	28	27%



10. Annual data provides an indication of the number of unique individuals contacted by the Outreach team in a year. In 2019/20, 434 rough sleepers were met by outreach: 134 (31%) were recorded as EEA nationals.
11. For a nightly snapshot – 23 rough sleepers were counted on 22 October 2020, six (26%) were EEA nationals.

Rough sleeping – work to date

12. In preparation for the EU Exit, there has been an increase in work carried out with EEA nationals who are rough sleeping.

13. In September 2019, City of London officers delivered bespoke training to the City Outreach team regarding EEA nationals' rights post-EU Exit, retaining of eligibility for support if engaging in genuine and effective work, and the EUSS application process.
14. The Ministry of Housing, Communities and Local Government (MHCLG) initiated a 'suspension of the derogation' for EEA nationals in October 2019. This enabled authorities in London, and other major UK cities, to fund three-month placements in accommodation for EEA national jobseekers. Under this initiative, the City of London commissioned a project in supported accommodation for EEA national rough sleepers and provided focused support to ensure that individuals were able to access employment.
15. In addition to this, we have used temporary accommodation placements and our commissioned Winter Assessment Service to further ensure that individuals have access to a safe space away from the streets, and that they are in the best position to engage with support services and the employment market.
16. We have asked all commissioned providers of support for rough sleepers to ensure that all EEA nationals found rough sleeping are given the opportunity to make an application to the EUSS, either by themselves or through referrals to free immigration advice agencies such as Praxis.
17. We are aware of two particularly long-term, street-attached, rough sleepers who have received full settled status through the EUSS with support from our commissioned services. In both instances this was secured by our commissioned Navigator service working in collaboration with Office of the Immigration Services Commissioner (OISC) registered legal services. There are a further two individuals who received full settled status while working with our emergency COVID-19 Assessment Centre.
18. We are currently aware of seven applications that have been made via our Carter Lane service, though we are yet to receive determinations on these cases. There are a further six individuals based in Carter Lane who are being supported to apply to EUSS.
19. From the beginning of September 2019 until the end of August 2020 a total of 132 accommodation outcomes for EU nationals are recorded; 67 of these are EEA rough sleepers. Of the 132 accommodation outcomes, 93 occurred from 1 March 2020. This is in line with our 'everyone in' response to COVID-19 and most placements were into emergency accommodation, either provided by ourselves or the Greater London Authority (GLA).
20. A significant barrier to the EUSS for those rough sleeping has been obtaining the correct and required documentation to complete applications successfully. We have seen several delays and refusals of status as a result of this.
21. Due to these challenges, there is a risk that a number of EEA nationals rough sleeping in the Square Mile will not have completed an EUSS application by 30 June 2021 when the EUSS closes. This means several individuals may have

uncertain status in the UK, with a likely inability to obtain welfare benefits, employment, housing or free healthcare.

22. A change to the Immigration Act 1971 comes into effect on 1 December 2020 which expects local authorities to consider current rough sleeping status when establishing eligibility under the Housing Act 1996 (as amended). Thereafter the Home Office will have the right to withdraw that individual's status in the UK.
23. Legal advice has been sought to establish the legal implications of following any given approach, particularly with regard to the most recent changes to the Immigration Act.
24. Consideration should be given to the approaches undertaken by other authorities. A service offer which differs significantly to that of neighbouring authorities could incentivise rough sleeping in the Square Mile or prove to be an outlier among regional peer authorities.
25. Severe Weather Emergency Protocol (SWEP) provision would remain available to all, as it is now.

Recommended approach to rough sleepers

26. Government funding, such as grants distributed by the MHCLG Rough Sleepers Initiative (RSI), will not be available for projects or schemes that contradict Government policy. This means that the funding of bed spaces, like those we currently provide under the suspension of the derogation, will no longer be available.
27. Support would be focused on funding and providing safe reconnections to home countries. The terms under which this would be undertaken would reference the guidance as set out in the Credible Offer policy. All reconnections would be voluntary.
28. Any short-term accommodation offers would be linked to a supported reconnection, and therefore a reasonable expectation that the individuals' rough sleeping would be resolved.
29. Any other accommodation offer would be limited to emergency interventions where there is a risk to life, or any other acute unmet need.
30. The rate at which EEA rough sleepers are currently reconnected remains relatively low, however, the changing legislative landscape could discourage rough sleeping for this group.
31. The cost of a supported reconnection is relatively low (air fares etc.) and the success rate can be improved by commissioning specialist delivery partners. An indicative cost for a locally provided supported reconnection could be between £500 and £1,500 depending on complexity and destination.

32. We are currently undertaking market engagement with potential specialist non-UK reconnection organisations. Any provider would come from the rough sleeping sector and have the required expertise.

33. The cost of providing supported reconnections will depend on several variables. The indicative annual costs provided below are based on the following assumptions:

- All supported reconnection undertaken by the City of London and its partners using existing capacity
- An accommodation stay of around one week to prepare for travel
- Known costs at Caritas Anchor House which include support and rent
- A unit cost of £887 per bed per week
- Approximately 25% of applicable clients taking up the offer
- A typical reconnection cost of £1,000
- 2019/20 data (134 EEA rough sleepers) used as a baseline
- The retention of a given number of rooms would be required through a commissioning arrangement.

Number supported reconnections required	of	Annual accommodation costs	Reconnection costs	Cost per annum
30		£26,610	£30,000	£56,610

34. Challenges include:

- Unpredictable demand for supported reconnection services
- Capacity within existing services to deliver an increased number of supported reconnections.

35. This approach is currently deliverable within the existing department budget.

Other considerations

36. A small number of EEA NRPF clients who remain rough sleeping will develop significant care and support needs. As with any rough sleeper, it may be established that action is required to safeguard an individual. This could include where there is a risk to life.

37. The City would seek to support and, where necessary, accommodate EEA rough sleepers with NRPF who present with acute or chronic physical and mental health needs. The Care Act and/or Human Rights Act could be used as a framework for establishing eligibility.

38. The most effective approach for this group would be a reactive position. Robust decision making achieved through recorded multi-agency discussion will result in a clear course of action on a case by case basis.

39. Accommodation stays for this group would need to be supported, be time limited, and linked to recovery, access to care and support or respite. This time could also be used to establish a credible offer of supported reconnection.
40. The costs of accommodation stays will vary considerably depending on the setting and duration. Weekly costs might be similar to those described in point 33.
41. The number of clients this could apply to is hard to predict, but numbers qualifying for assistance under Care Act or Human Rights Act will be small. In the past year we have sought to assess five EEA nationals under the Care Act and a single case was assessed under the Human Rights Act.
42. Challenges include:
- Knowing how and when to end a placement. A 12-week period is arbitrary to how long it may take to effect meaningful change in someone's circumstances
 - Sourcing and procuring suitable bed spaces required. There is huge demand within the sector presently
 - Suspicion and scepticism are likely to be high among this cohort after EU withdrawal, leading to unpredictable levels of uptake
43. It is likely this approach could be covered by the existing department budget.

The fullest picture

44. The working assumptions, challenges and indicative costs set out in paragraphs 44 to 48 are provided to help establish the most comprehensive estimate available, based on seeking to assist all EEA NRPF rough sleepers. This is for illustrative purposes only and is not considered a viable option.
45. In order to continue supporting all EEA rough sleepers all the measures described in the recommended approach set out above would be required, but the principle would be extended to any EEA rough sleeper regardless of their circumstances.
46. A framework would still be required to determine the duration and objectives of accommodation stays.
47. The same challenges found in ending accommodations stays would exist, but to a greater extent.
48. The cost of delivering this approach would be dependent on the assumptions found in the recommendation, but for a much larger cohort.
- An accommodation stay of 12 weeks per placement
 - Known costs at Caritas Anchor House, which include support and rent
 - A unit cost of £887 per bed per week
 - 70% of applicable rough sleepers taking up the offer of accommodation
 - 2019/20 data (134 EEA rough sleepers) used as a baseline

- The retention of a given number of rooms would be required through a commissioning arrangement.

Number of individuals assisted	Number of rooms required	Annual unit cost	Cost per annum
94	24	£46,124	£1,106,976

Corporate & Strategic Implications

49. There are no corporate and strategic implications directly related to this report.

Conclusion

50. The level of rough sleeping in the Square Mile is currently in decline, mainly related to the external context created by COVID-19 and the City of London's response in applying the Government's 'everyone in' approach.

51. The level of EEA rough sleeping is quite stable, but, as a proportion of our total rough sleeping, is currently increasing due to an overall decrease in rough sleeping numbers.

52. Changes to legislation and Government policy during and post the EU exit will affect EEA rough sleepers and economic migrants – fewer existing rough sleepers will have access to support for housing costs and welfare benefits.

53. EEA rough sleepers who are unable to work after 1 February will be very difficult for a local authority to support. Any housing option must be discretionary.

54. Based on current legislation, no new arrivals from the EU after 31 December 2020 will have access to housing costs or welfare benefits.

55. The recommendation represents an extension of our existing approach - supported reconnection can be a means of solving a person's rough sleeping. Where the client wishes to return home, but lacks the means to do so, we can assist through our existing services or consider commissioning additional expertise.

56. In the small number of cases where there is a risk to life or an immediate safeguarding risk, we can deploy the Care Act and Human Rights Act as reference points and decision-making frameworks.

Appendices

- None

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