



Homelessness and Rough Sleeping Sub Committee

Date: MONDAY, 28 JUNE 2021

Time: 11.00 am

Venue: VIRTUAL PUBLIC MEETING (ACCESSIBLE REMOTELY)

Members:

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

Enquiries: Kerry Nicholls 020 7 332 1262
kerry.nicholls@cityoflondon.gov.uk

Next Meeting Date: 11.00am, Monday 4 October 2021

Accessing the virtual public meeting

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

<https://youtu.be/uE4F8TXKZZI>

This meeting will be a virtual meeting and therefore will not take place in a physical location. Any views reached by the Committee today will have to be considered by the Assistant Director (People) after the meeting in accordance with the Court of Common Council's Covid Approval Procedure who will make a formal decision having considered all relevant matters. This process reflects the current position in respect of the holding of formal Local Authority meetings and the Court of Common Council's decision of 15th April 2021 to continue with virtual meetings and take formal decisions through a delegation to the Town Clerk and other officers nominated by him after the informal meeting has taken

place and the will of the Committee is known in open session. Details of all decisions taken under the Covid Approval Procedure will be available on line via the City Corporation's webpages.

A recording of the public meeting will be available via the above link following the end of the public meeting for up to one municipal year. Please note: Online meeting recordings do not constitute the formal minutes of the meeting; minutes are written and are available on the City of London Corporation's website. Recordings may be edited, at the discretion of the proper officer, to remove any inappropriate material.

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**

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

3. **ELECTION OF CHAIRMAN**

To elect a Chairman in accordance with Standing Order 29.

For Decision

4. **ELECTION OF DEPUTY CHAIRMAN**

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

For Decision

5. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 21 April 2021.

For Decision
(Pages 7 - 12)

6. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information
(Pages 13 - 14)

7. **ROUGH SLEEPING INITIATIVE GRANT FUNDING 2021/22**

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

For Information
(Pages 15 - 22)

8. **GROWTH PROGRAMME UPDATE REPORT**

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

For Information
(Pages 23 - 26)

9. **QUARTER 4 2020/21 PERFORMANCE REPORT**

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

For Information
(Pages 27 - 44)

10. **HOMELESS LINK IMMIGRATION PLEDGE APPEAL**

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

For Discussion
(Pages 45 - 58)

11. **CITY OF LONDON POLICE UPDATE**

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

For Information

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

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

14. **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

15. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 21 April 2021.

For Decision
(Pages 59 - 60)

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

Wednesday, 21 April 2021

Minutes of the meeting of the Homelessness and Rough Sleeping Sub Committee held via Microsoft Teams at 1.45 pm

Present

Members:

Marianne Fredericks (Chairman)	Paul Kennedy, City Church
Munsur Ali	Alderman Bronek Masojada
Randall Anderson	Benjamin Murphy
Mary Durcan	Henrika Priest
Helen Fentimen	Jillian Reid, Safer City Strategic Partnership
Alderman Alison Gowman	Ruby Sayed
Alderman Vincent Keaveny	

Officers:

Nisha Backory	- Community and Children's Services Department
Sinead Collins	- Community and Children's Services Department
Simon Cribbens	- Community and Children's Services Department
Kirsty Lowe	- Community and Children's Services Department
Will Norman	- Community and Children's Services Department
Chris Pelham	- Community and Children's Services Department
Lauren Walker	- Community and Children's Services Department
Simon Young	- Community and Children's Services Department
Bukola Soyombo	- Chamberlain's Department
Kerry Nicholls	- Town Clerk's Department
Sarah Phillips	- Town Clerk's Department
Chandni Tanna	- Town Clerk's Department
PC Jason Foster	- City of London Police

1. APOLOGIES

Apologies for absence were received from Tijs Broeke and Natasha Lloyd-Owen.

Apologies for lateness were received from Mary Durcan and Alderman Vincent Keaveny.

2. MEMBERS DECLARATIONS UNDER THE CODE OF CONDUCT

There were no declarations.

3. MINUTES

In considering Minute 8: Rough Sleeping Data Q3 2020/21, the Chairman requested an update on the number of individuals who were rough sleeping in the City of London during Quarter 4. The Rough Sleeping Coordinator

confirmed that the number had reduced from 132 in Quarter 3 to 102 in Quarter 4, with ten fewer flow clients and 22 fewer long-term rough sleepers.

The Sub-Committee was advised that following consideration by the Chairman and Officers it was proposed to put the Sub-Committee's Terms of Reference to the meeting of the Community and Children's Services Committee on 30 April 2021 for final approval with the below proposed amendment to Item 2:

"To have an overview of government and regional policies on rough sleeping; and advise the Grand Committee of their impact on the City of London Corporation's Rough Sleeping and Homelessness Strategy and practice arrangements."

RESOLVED, that the public minutes and non-public summary of the meeting held on 22 February 2021 be approved.

4. OUTSTANDING ACTIONS

Members received the Sub-Committee's outstanding actions list and the following update was noted:

- The Homelessness and Rough Sleeping Sub-Committee Away Day would be held at 1.00pm on 15 July 2021. Groundswell had been invited to attend the Away Day to give an update on its City Voices work which would provide a foundation for the future strategic direction of the work of the Sub-Committee.

RESOLVED, that outstanding actions be noted.

5. COVID-19 RECOVERY PLAN PROGRESS REPORT

The Sub-Committee considered a report of the Director of Community and Children's Services providing an update on the COVID-19 Recovery Plan and the following point was made:

- In May 2020, the City of London Corporation developed a COVID-19 Recovery Plan to ensure the safe recovery of the City's rough sleeping population following the COVID-19 period and develop new interventions to increase the long-term capacity of the service. Significant progress had been made in delivering the Plan with almost 400 individuals supported into accommodation since the start of the COVID-19 period in March 2021. There were currently 57 individuals being accommodated at Carter Lane hostel and Travelodge London City and work to support these individuals to move into suitable accommodation was ongoing. In response to a question from a Member, the Head of Homelessness Prevention and Rough Sleeping confirmed that use of the Carter Lane hostel would cease at the end of December 2022, by which time it was anticipated the High Support Hostel would be operational.

RESOLVED, that the update be noted.

6. **STATUTORY HOMELESSNESS ANNUAL SUMMARY REPORT 2020/21**

The Sub-Committee considered a report of the Director of Community and Children's Services presenting the Statutory Homelessness Annual Summary 2020/21 and the following points were made:

- There had been a significant increase in the number of approaches to the City of London Corporation's statutory homelessness service during the COVID-19 period, including households living in precarious situations as well as those affected by domestic violence and relationship breakdown. To help manage this increase in demand for services, new working arrangements had been introduced including online self-referral, phone assessment and a triage service to determine homelessness, eligibility and local connection for all approaches. Work had also been undertaken to introduce a more collaborative way of working, both with existing partners such as the *No First Night Out* team and by fostering new working relationships, including with temporary accommodation providers. A Committee Member was pleased to note the increased emphasis on collaborative working and underlined the need to continue to build on this. Another Member suggested this include regional partners and the Head of Homelessness Prevention and Rough Sleeping confirmed that the City of London Corporation had good links with sub-regional bodies and forums which met regularly to discuss changes in legislation and policy as well as share good practice. The City of London Corporation was also a member of the Mayor of London's *Life Off the Streets* taskforce.
- The Chairman queried whether there were enough resources in place to support statutory homelessness services in light of the requirements of the Homelessness Reduction Act 2017 as well as the pressures of the COVID-19 period. The Head of Homelessness Prevention and Rough Sleeping advised that the COVID-19 period had placed significant pressure on staff and resources, but a focus was being placed on developing a sustainable service model that would be sufficient to meet future service demand. In response to a question from a Committee Member, the Head of Homelessness Prevention and Rough Sleeping confirmed that forecasting was used to review and anticipate future demand for the City of London Corporation's statutory homelessness services and that a range of forecasting data would be presented to the next meeting of the Sub-Committee on 28 June 2021 as well as to the Away Day on 15 July 2021 for Members' information.

RESOLVED, that the update be noted.

7. **GROWTH PROGRAMME UPDATE REPORT**

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

- During the 2020/21 financial year, the Homelessness and Rough Sleeping Growth Programme had adapted to the short-term and urgent needs arising from the COVID-19 response. The enhanced Private Rental Sector approved provider framework had been launched on 1 April 2021, and workstreams relating to the City Assessment Centre and High Support Hostel had been accelerated and were on track for delivery during the 2021/22 financial year. Savings identified during the 2020/21 financial year had been redeployed to support the wider COVID-19 response and recovery work, including the ongoing operation of 45 beds at Carter Lane hostel. Work to introduce an enhanced supported reconnection function and anti-social behaviour/community support enhancements had been delayed by the COVID-19 period, but plans were in place to strengthen the Corporation's supported reconnection offer.

RESOLVED, that the update be noted.

8. SEVERE WEATHER EMERGENCY PROTOCOL 2020/21

The Sub-Committee considered a report of the Director of Community and Children's Services providing an interim report on the Severe Weather Emergency Protocol (SWEP) for Winter 2020/21 and the following point was made:

- During Winter 2020/21, SWEP was activated a total of ten times across 41 nights. A total of 35 homeless or rough sleeping individuals had been brought into accommodation since 23 December 2020, of which 33 had immediately transferred to other accommodation once SWEP had been deactivated. In response to a question from a Committee Member, the Rough Sleeping Service Manager explained that the CHAIN multi-agency database recorded details of individuals accessing SWEP provision and that this ensured individuals were not double counted within homelessness datasets. A Committee Member noted the role of SWEP as a means of providing early intervention to individuals by supporting them into appropriate accommodation. Another Committee Member underlined the need to consider climate implications linked to activations of the SWEP in relation to all forms of extreme weather. The Assistant Director (People) confirmed that the Corporate and Strategic implications included within the Corporation's report template included Climate implications and this would form a part of all future reporting of the use of the SWEP.

RESOLVED, that the update be noted.

9. RSI YEAR 4 FUNDING PROPOSAL

The Sub-Committee considered a report of the Director of Community and Children's Services presenting the Rough Sleeping Initiative Year 4 Funding Proposal and the following points were made:

- The Rough Sleeping Initiative (RSI) was launched by the Government in March 2018 with the aim of reducing overall rough sleeping numbers in

the 83 local authorities with the highest numbers of people sleeping rough, based on the 2017 rough sleeping snapshot. The City of London Corporation had submitted a proposal for Year 4 of the RSI scheme totalling £1,070,244. This included continuing existing RSI interventions from Year 3 including a Rough Sleeping Coordinator, the Tower Hamlets and CoL Navigator Project, an additional City outreach worker, two additional Anchor House EU beds and continuation of the *No First Night Out* principle of homelessness prevention to part-fund emergency accommodation. It was proposed to introduce further interventions in April 2021 including a Rough Sleeping Tenancy Support Officer, Psychotherapy service and the Mobile Support Intervention Team.

- In response to a question from a Member, the Rough Sleeping Service Manager confirmed that a quarter of the RSI Year 3 grant totalling £347,500 would fund all existing interventions from April to June 2021, including a number of staff on fixed-term contracts. The Ministry of Housing, Communities and Local Government would notify local authorities of the outcome of the Year 4 RSI funding award process in May 2021, at which point it was hoped to extend the fixed-term contracts of these staff for a further year. The Head of Homelessness Prevention and Rough Sleeping confirmed that the difficulties of long-term planning in relation to the RSI Grant had been flagged with the Government; however, as the planned programme had been co-produced with the Ministry of Housing, Communities and Local Government, it was anticipated that the grant award was likely to be successful. A further update on the RSI Year 4 Funding Proposal would be presented to the next meeting of the Sub-Committee on 28 June 2021.

RESOLVED, that the update be noted.

10. **CITY OF LONDON POLICE UPDATE**

Members received an update of the Superintendent of the City of London Police and the following point was made:

- Operation Luscombe, which aimed to identify issues and support those who were living on the streets, had been run at minimal capacity for much of the COVID-19 period but was now relaunching with an intervention hub due to take place at 1.00pm on 28 April 2021 at St. Botolph without Bishopsgate Church. This would be supported by increased digitisation with Operation Luscombe now accessible via front-facing devices used by the Sector Policing Team and Partnership and Intervention Hub. This functionality was being delivered at minimal cost but it was likely that funding would be sought from the Safer City Partnership Strategy Board as it was rolled out to further Police teams. The Police Representative confirmed that since the launch of the City Assessment Service, changes had been made to ensure that individuals receiving support within the City of London were not excluded. A Member emphasised the importance of ensuring that begging levels did not increase as the City of London exited the COVID-19 period.

RESOLVED, that the update be noted.

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

There were no questions.

12. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was one item of other business.

The Chairman thanked Members and Officers for their hard work and dedication during the 2020/21 municipal year. The COVID-19 period had been very challenging but had achieved a number of excellent outcomes for individuals and households affected by homelessness and rough sleeping.

13. 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
14-17

Para no
3

14. NON-PUBLIC MINUTES

RESOLVED, that the non-public minutes of the meeting held on 22 February 2021 be approved.

15. CITY OF LONDON POLICE NON-PUBLIC UPDATE

The Sub-Committee heard a non-public update of the Chief Inspector of the City of London Police.

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

There were no non-public questions.

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

There was one item of other business.

The meeting closed at 2.50 pm

Chairman

Contact Officer: Kerry Nicholls 020 7 332 1262
kerry.nicholls@cityoflondon.gov.uk

Homelessness and Rough Sleeping Sub Committee – Outstanding Actions
April 2021 Update

Action Number	Agenda Item	Action	Progress Update
1 December 2020			
4/21/HRS	4. Statutory Homelessness Annual Summary Report	A range of forecasting data to be presented to the meeting of the Sub-Committee on 28 June 2021 as well as to the Away Day on 15 July 2021.	A range of forecasting data would be presented to upcoming meetings and the Away Day of the Homelessness and Rough Sleeping Sub-Committee as it became available.
5/21/HRS	8. Severe Weather Emergency Protocol 2020/21	Future SWEP reports to include consideration of climate implications (header in Corporation's report template).	Noted - Officers to include in future reporting.
6/21/HRS	9. RSI Year 4 Funding Proposal	A further update on the RSI Year 4 Funding Proposal to be presented to the meeting of the Sub-Committee on 28 June 2021.	Completed.
7/21/HRS	15. City of London Police Non-Public Update	An individual case flagged by a Member around the Police's approach to individuals who were rough sleeping to be followed up by the Police Representative.	Completed. [Note: Any discussions on this action must be held in non-public]
1 December 2020			
17/20/HRS	4. Outstanding Actions	An away day to be held in February/March 2021 to set goals for the forthcoming municipal year and consider the existing skills available to the Sub-Committee and whether there was a need for an external Member with relevant experience to join the Sub-Committee.	The Away Day was being rescheduled to September 2021 (date to be confirmed). Groundswell had been invited to provide an update on its City Voices work (Clerk)

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Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	28 June 2021
Subject:	Public
Rough Sleeping Initiative Grant Funding 2021/22	
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: Andrew Carter, Director of Community and Children's Services	For Information
Report author: Kirsty Lowe, Rough Sleeping Service Manager, Department of Community and Children's Services	

Summary

This report provides detail on the various City of London (CoL) interventions funded by the Rough Sleeping Initiative (RSI) grant for 2021/22. This is the fourth consecutive year the Ministry of Housing, Communities & Local Government (MHCLG) has awarded the RSI grant to support local authorities to reduce overall rough sleeping numbers. On 15 May, the MHCLG notified the CoL that it would receive a total of £1,028,677.00 from the RSI grant from April 2021 to March 2022 – the CoL's largest RSI grant to date.

Recommendation

Members are asked to:

- Note the report

Main Report

Background

1. This report follows on from the *RSI Year 4 Funding Proposal* report presented at the April 2021 Homelessness and Rough Sleeping Sub-Committee.
2. The RSI was launched in March 2018 with a total grant funding of £30 million. The total grant fund for 2021/22 is £203 million and has been allocated to 281 local authorities.
3. The initiative is part of the Government's ongoing Rough Sleeping Strategy which sets out the vision for halving rough sleeping by 2022 and ending rough sleeping by the end of the current Parliament.

4. The initiative seeks to support people sleeping rough to get off the streets and develop their wellbeing and stability, helping to reduce the number of people sleeping rough in both the short and longer term.
5. On 12 March 2021, CoL officers submitted the Year 4 RSI proposal totalling £1,070,224, with the aim to reduce the annual street count figure in November 2021 to 10.
6. On 19 March 2021, the MHCLG informed the CoL that they would automatically be given continuation funding for the period 1 April to 30 June 2021, equal to three months of the CoL RSI Year 3 allocation, £147,575.
7. Further to this, MHCLG confirmed that each local authority's RSI allocation would provide additional resource to continue to support and protect clients from the COVID-19 pandemic in Quarter 1. The CoL received £200,000, which was apportioned to building costs for the Carter Lane hostel.
8. On 15 May 2021, Catherine Bennion, Deputy Director of Homelessness and Rough Sleeping at the MHCLG notified all local authorities of the outcome of the RSI Year 4 bids. The CoL was informed that they would receive a further £725,737.00 from 1 July 2021 to 31 March 2022, and that all proposed interventions were approved.
9. The Quarter 2 funding – four amounts of £725,737.00 – took into account an unspent figure of £44,635 rolled over from Year 3. The Year 3 underspend was mainly due to salary savings whereby one post-holder resigned and a decision was made not to recruit into the role. With another post, there were significant delays due to the recruitment processes.
10. The CoL total RSI payment for the financial year 2021/22 is £1,028,677.00 ring-fenced revenue.

Current Position

11. The CoL's RSI Year 4 grant will fund 14 different interventions provided by a minimum of eight organisations. Most interventions fund new and existing posts, employed directly by the CoL or through commissioned partners. There are also various accommodation services, specialised services around immigration and talking therapy, as well as a personalisation budget.
12. The table below shows the Year 4 interventions, which organisations will provide, including whether they are existing or new interventions from Year 3:

	Intervention	Provider	Existing /New
1	Additional Outreach Worker	Thames Reach	Existing
2	Outreach Senior Practitioner		New
3	Mobile Intervention Support Team		New
4	Personalisation Budget		New

5	Rough Sleeping Co-ordinator	CoL	Existing
6	Carter Lane Hostel		Existing
7	Tenancy Support Officer		New
8	Pathway Liaison Officer		New
9	LBTH/CoL Navigator Service	St Mungo's	Existing
10	City Travelodge	Travelodge	Existing
11	Anchor House EU beds	Caritas	Existing
12	Psychotherapy Service	Providence Row Charity	New
13	Ad-hoc Emergency Accommodation	Various providers	New
14	EU Advisor	Unknown	New

13. Additional Outreach Worker

Year 4 RSI has enabled the CoL to continue to fund an additional outreach worker to enhance the core City Outreach service. Thames Reach recruited into this role at the start of the financial year and the recruit has quickly settled into the team. The additional staff member helps create a better balance between shift work and case work now that the service covers a seven-day rota. The role has also helped the City manage COVID-19 emergency accommodation placements without stretching the capacity of the service to carry out core work.

14. Outreach Senior Practitioner

The Senior Practitioner role will sit in the City Outreach team, providing co-ordination of some of the most well-known City clients. They will have a strong presence in multi-agency meetings, will co-ordinate other newly funded RSI interventions and provide additional managerial support to the team. Particular focus will include the Mobile Intervention Support Team (see paragraph 16) and the Living on the Streets (LOS) population. The Senior Practitioner will lead on the case management system of all CoL clients, ensuring that each have a clear move-on pathway and a City Credible Offer. Recruitment into this role has already taken place with a confirmed start date in June.

15. Personalisation Budget

The Outreach Senior Practitioner will have oversight and management of the £10,000 personalisation and welfare budget. This budget is there to give the outreach team the opportunity to finance items or opportunities for City clients, from essentials such as toiletries or food while other purchases could be tailored more to a personal goal such as training or education. The aim of the Personalisation Budget is to strengthen clients engagement with the City Outreach team and support individuals to move away from the streets and maintain accommodation.

16. Mobile Intervention Support Team (MIST)

Thames Reach has provided the MIST service since April of this year. The aim of the service is to provide in-reach support to those accommodated in hotels and other City-funded temporary accommodation. The service consists of two peripatetic workers who work alongside the City Outreach team and partners, also providing a seven-day rota. The MIST service focuses on stabilising individuals while in accommodation and ensuring that clients get the right level of health intervention. MIST will also provide next-day follow-up with any Outreach

clients accessing the on-the-night assessment beds at Carter Lane. This service is currently funded till October 2021, when the service will end.

17. Rough Sleeping Co-ordinator

The CoL Rough Sleeping Co-ordinator (RSC) role remains essential to the needs of the CoL rough sleeping team, providing day-to-day liaison between the City and commissioned partners. The RSC played a vital role in the CoL's rapid response to COVID-19 and the rollout of the CoL's emergency accommodation at Carter Lane and City Travelodge. The RSC will also play an active role in the support and management of commissioned RSI interventions and the expansion of the rough sleeping hostel pathway. The post is currently vacant, however, recruitment is underway and we are hopeful to have someone in post by August.

18. Carter Lane Hostel

RSI Year 4 funds will support CoL to finance rental costs for Carter Lane for four months. Carter Lane hostel is a 45-bed hostel providing emergency and medium-term accommodation to those who previously slept rough in the Square Mile and were brought in under the 'Everyone In' approach. Carter Lane has been leased from the Youth Hostels Association until the end of this calendar year.

19. Tenancy Support Officer

The CoL have increased the size of the existing City Tenancy Support Team (TST) by recruiting a fourth TST officer, who started in their new role in April. This post-holder will carry a maximum caseload of 25 to 30 individuals, and each individual will have previously slept rough in the CoL. These individuals will have accessed the CoL accommodation pathway and been placed into semi/independent accommodation. The TST worker will either lead or work alongside CoL-commissioned support services to ensure that all aspects of a client's tenancy, benefits/income and wellbeing is managed effectively so the individual can settle in and maintain their new home. The TST officer will support and challenge individuals to acknowledge their assets to work towards personal goals and long-term independence.

20. Pathway Liaison Officer

The CoL recruited into this new role in April and the post-holder has made significant impact already. The Pathway Liaison Officer (PLO) carries a maximum caseload of 25 to 30 individuals, where the focus is to facilitate moves into, between, and out of the accommodation pathway. Under direction of the Pathway Co-ordinator, the post-holder works to reduce barriers to 'move on' within the pathway and works with internal and external partners to find solutions as issues arise. For the first six months the PLO will work one day a week at Carter Lane hostel to provide oversight and support to staff and clients. The PLO took a similar approach at the City Travelodge until its closure on 17 May 2021, working closely with the MIST service to ensure a smooth transition from hotel to move-on accommodation.

21. London Borough of Tower Hamlets (LBTH)/CoL Navigator Service

The RSI Year 4 grant will fund the jointly commissioned CoL/LBTH Navigator service, provided by St Mungo's for a third year. The service has continued to achieve well against its aims to support CoL/LBTH transient rough sleepers away

from the streets and into their own accommodation. Navigator clients often have a history of being disengaged from services or excluded from housing services multiple times for many years. The extra capacity and focus that this team brings to CoL clients is invaluable. The cross-borough approach is very effective at breaking down barriers for the client, and also between the two local authorities. The navigator team has been able to solve significantly complex cases and accomplish some great achievements for some of the borough's most well-known LOS clients.

22. City Travelodge

The RSI Year 4 grant has funded the 20 block-booked beds at the City Travelodge from April to 17 May 2021. This provision was previously funded by the MHCLG Protect Programme, providing a much-needed on-the-night offer of accommodation to anyone met sleeping rough in the City by the Outreach team. These 20 beds at the Travelodge resulted in a minimum of 25 individuals being quickly supported away from the streets into hotel accommodation where they were rapidly case-managed by the MIST team and/or the PLO and provided with a City credible offer. Travelodge guests also received on-site support from health professions such as Doctors of the World, doctors and nurses from East London NHS Foundation Trust and the Rough Sleeping Mental Health Programme.

23. Anchor House EU beds

RSI Year 4 funding has enabled the CoL to continue to fund two European Union (EU) beds at Anchor House hostel, a Caritas-supported setting based in Newham. This service can provide a route off the streets for some of the City's EU clients, where professionals can start to build a picture of a person's situation and begin to investigate a client's immigration status. Due to language barriers and possible distrust of services, it is very hard for professionals to build up a working relationship with EU clients from the streets. Anchor House is able to offer accommodation and support to carry out a comprehensive assessment of a person's options and ensure that they are provided with a credible offer. Clients will be worked with intensely over a maximum period of 12 weeks, where the focus will be to stabilise the individual, investigate their immigration status and increase the client's opportunities to gain employment.

24. Psychotherapy Service

RSI Year 4 has enabled the CoL to continue to fund the Psychotherapy service provided through Providence Row Charity, which was previously funded through the Protect Programme. Providence Row Charity has provided an outreach psychotherapy service in LBTH since 2018 and has achieved some great outcomes for LBTH clients, particularly individuals who struggled with drug and alcohol or mental health support needs. The CoL feels this specialised and flexible approach could also assist CoL clients; particularly long-term street-attached clients who have recently come off the streets for the first time in many years. The CoL feel this service is desperately needed and often overlooked as part of the holistic approach to supporting those that have been through rough sleeping and other traumatic experiences, so they have the resilience and know how to live independently away from the streets permanently. The psychotherapist currently works part-time providing one-to-one sessions to clients accommodated at Carter Lane hostel.

25. Ad-hoc Emergency Accommodation

The RSI Year 4 grant has made funds available to the CoL Rough Sleeping team to finance ad hoc accommodation when needed. This could be utilised in various ways: by the City Outreach team through on-the-night offers of emergency accommodation to City clients, particularly when there are no available assessment beds at Carter Lane, or who were (up until 17 May 2021) accommodated at City Travelodge but need more time for their identified mid- to long-term accommodation options to become available. These individuals will be supported by MIST and/or the rough sleeping TST worker. Temporary accommodation and ad hoc hotel accommodation is also supporting the Rough Sleeping COVID-19 Recovery Plan, so individuals are more likely to take up the offer of COVID-19 vaccinations while in accommodation.

26. EU Advisor

The RSI Year 4 grant will enable the CoL to newly commission a specialised immigration service to provide qualified assessments to 15 to 30 City clients each year. This would involve thorough investigation, liaison and submission of applications to the Home Office and embassies, direct case management of the client and ongoing contact with referral services. The advisor would also provide training and support to other commissioned services, providing upskilling opportunities to all. This intervention will need to be newly commissioned and will need to go out to tender in the competitive market. CoL officers are at the early stage of tendering for this piece of work with a view to commissioning a provider by the end of July 2021.

Corporate & Strategic Implications

Financial Implications

27. The CoL's grant funding total of £1,070,224 for 2021/22 is ring-fenced for the sole purpose of providing RSI-funded services that were approved by MHCLG.
28. The allocation will be split into three payments. Payment of second tranche funding is dependent on whether the agreed grant conditions have been complied with.
29. If an authority fails to comply with any of the conditions, MHCLG may reduce, suspend, or withhold the grant, or may require repayment of the whole or any part of the grant.
30. If repurposing interventions is required, the authority must engage with their advisor and MHCLG for prior written approval to discuss whether exceptional circumstances apply.
31. Resource implications – N/A
32. Legal implications – N/A

33. Risk implications – N/A

34. Equalities implications – N/A

35. Climate implications – N/A

36. Security implications – N/A

Conclusion

37. The MHCLG have confirmed the CoL Year 4 RSI grant award of £1,070,224.00. This funding is to finance the commissioning and delivery of 14 different interventions that aim to support people sleeping rough to get off the streets and develop their wellbeing and stability, resulting in a reduction of people sleeping rough in the City. The majority of these interventions are new, however, most new interventions have already been recruited to or commissioned and are delivering as intended.

Appendices

- None

Kirsty Lowe

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

T: 020 7332 3170

E: kirsty.lowe@cityoflondon.gov.uk

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Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	28 June 2021
Subject: Growth Programme Update Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,4,10
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	

Summary

This report provides a progress update on the two main elements of the City of London's growth programme for rough sleepers – the City of London assessment centre and the new high-support hostel. This report provides a brief summary of the current position, along with timetables for forthcoming activity.

Recommendation

Members are asked to:

- Note the report

Main Report

Background

1. To support the response to COVID-19, the Rough Sleeping Programme has brought forward plans to deploy a high-support hostel, originally intended for 2022/23. Currently some of our most entrenched rough sleepers are supported at the Youth Hostels Association (YHA) Carter Lane, however, this is not a sustainable option, and currently cannot accommodate individuals beyond week commencing 6 December this year. Therefore, the Rough Sleeping Programme is seeking ways to expedite the deployment of the high-support hostel in 2021/22, with the best-case scenario resulting in a decant of the most vulnerable individuals into new accommodation ahead of December this year.

Current Position

High-support Hostel

2. A provider has been identified following an approved tender award process. A contract award is pending. One of the key benefits of the offer is the inclusion of

suitable accommodation at an existing hostel which will eventually accommodate around 30 individuals with complex needs.

3. The chosen location requires some initial refurbishment prior to opening. Currently the City is part funding a feasibility phase which will clarify what works are required to the site. The capital budget for refurbishment is expected to achieve the desired outcome of creating a high-quality Psychologically Informed Environment.
4. Running in parallel, our Chief Officer is in the process of liaising with the relevant local authority leadership to confirm their support for the project, and the City currently considers it desirable to proceed with the project.
5. Once the feasibility phase is completed (see the timeline in the table in paragraph 7), the design of the site and timeline for delivery can be agreed between the City and the provider. At this point, the programme will commence to make the site ready for the transfer of any remaining clients from Carter Lane and inclusion of other individuals identified with complex needs.
6. The City Rough Sleeping Service is developing move-on offers for all but a small number of clients currently at Carter Lane, leaving a small cohort of hard-to-place individuals with complex needs who need to be relocated to the new site.
7. An outline of the next steps is shown in the table below. This timeline is based on the provider's current assessment of the work required to the site. However, further meetings scheduled after the feasibility work is complete will help to confirm the timeline.

Date	Activity
May – July	Feasibility and designs completed and agreed
	Secure leadership support from host local authority
July	Gateway 5 to draw down the capital to support the approved plans
August – September	Provider tender for contractor
September – December	Refurbishment completed
	Move across any remaining cohort (c10) to new site from Carter Lane
	Any spare capacity to be used for temporary assessment beds until the new assessment centre opens in early 2022

8. The current Carter Lane lease runs until 31 March 2022. However, we expect to execute a break clause on 31 December 2020. There is a risk that a gap will emerge should any element of the project slip due to delays associated with any of the above stages. We are liaising with the current projects management team to plan for a phased approach to resettle some of the most vulnerable individuals earlier than December, which will alleviate some of the service pressure.

9. The ultimate safeguard to ensure that no one we have accommodated is at risk of returning to the streets is to use the final three months of the Carter Lane lease, taking us to 31 March 2022. In the unlikely event that this is required, the cost would be largely offset by the savings made by the delayed opening of the new service.
10. We are discussing contingencies with the provider, including the option of utilising other locations within their portfolio on a temporary basis should the site's refurbishment plan run overtime.

Assessment Centre

11. An initial feasibility phase for the planned site was completed and presented to Members. Members have requested that the site be surveyed formally by a structural engineer to provide additional assurance. Due to supplier timetables, this will now be completed from 8 to 9 June.
12. A subterranean CCTV drain survey will be carried out on 10 June.
13. The Heads of Terms is currently being finalised (subject to the structural survey) which will likely involve a 20-year lease with a 10-year break clause as per current negotiations. Once established, this site will provide a long-term City-based assessment centre.
14. The following timetable assumes a positive structural survey report.

Date	Activity
May – June	CCTV survey of site drainage
	Structural survey and report
	Head of Terms agreed
	Onboard professional services once assurance is in place
June – July	Complete spatial designs
	Prepare planning application
August – October	Planning determination period
	Service tender and award
	Construction tender and award
October – February	Construction programme completed (three months)
	Service mobilisation
	Client fit-out
	Go live

Corporate & Strategic Implications

- 15. Strategic implications – N/A
- 16. Financial implications – N/A
- 17. Resource implications – N/A
- 18. Legal implications – N/A
- 19. Risk implications – N/A
- 20. Equalities implications – N/A
- 21. Climate implications – N/A
- 22. Security implications – N/A

Conclusion

- 23. The site which the provider has offered for the high-support hostel is deemed suitable to our requirements. It is of sufficient size, and the required refurbishment is thought to be achievable within the capital budget.
- 24. On 16 June, the provider will supply more detailed work programme plans and options for designing a Psychologically Informed Environment.
- 25. Contingency planning is under way to ensure that an initial cohort of rough sleepers currently residing at Carter Lane can move to occupy the new service at the earliest opportunity.
- 26. Preliminary work continues at the site identified for the assessment centre. Surveys being undertaken in early June will confirm if we can proceed with lease negotiations.
- 27. Assuming a positive outcome from the surveys, we expect the service to go live in early 2022.

Appendices

- None

Will Norman

Head of Homelessness Prevention and Rough Sleeping

E: will.norman@cityoflondon.gov.uk

T: 07701372884

Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	28 June 2021
Subject: Quarter 4 2020/21 Performance Report	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2, 3, 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: Kirsty Lowe, Rough Sleeping Service Manager	

Summary

This report presents data and a brief narrative related to rough sleeping in the City of London (CoL) during the Quarter 4 (Q4) period, January to March 2020/21, with some reference to yearly comparisons. This report reflects on a decrease in rough sleeping during the period, returning back to particularly low levels seen during the Q2 period, July to September 2020/21. Overall, there has been a reduction in the number of people seen sleeping rough in Q4 compared to Q3, with a decrease in all key areas: those new to rough sleeping in CoL, the number of long-term Living on the Streets (LOS) clients and fewer returning to rough sleeping in the CoL.

Recommendations

Members are asked to:

- Note the report.

Main Report

Background

1. There is a general trend of decline in rough sleeping in the Square Mile since Q4 2019/20 (January–March). The table below shows the total number of individuals who slept rough in the CoL each quarter, from 2019/20 Q4 at 172 individuals to the most recent Q4 2020/21 at 102.

2019/20	2020/21			
Q4	Q1	Q2	Q3	Q4
172	140	105	132	102

2. Accommodation outcomes over the previous nine months have been high, with a particularly increased level of emergency short-term accommodation outcomes in Q1.

Current Position

3. There was a decrease of 23% in those seen sleeping rough during Q4 2020/21, decreasing from 132 to 102. This decrease in numbers is in line with neighbouring boroughs Southwark which saw a decrease of 30% and Tower Hamlets which saw a decrease of 26% from Q3 to Q4.
4. There has been a notable decrease in new rough sleepers being seen in the authority area, decreasing from 39 individuals in Q3 to 29 in Q4. This equates to a 29% decrease. On review of the CoL flow percentage compared with Greater London, CoL's 28.4% is significantly lower than the average of Greater London at 52.2%.
5. There has been a notable decrease in individuals returning to sleep rough in the authority area, decreasing from 52 individuals in Q3 to 40 individuals in Q4. This equates to a 26% decrease. Overall, for the year, CoL recorded 211 intermittent rough sleepers, a decrease of 14% annually compared to a 12% decrease in Greater London from 2019/20 to 2020/21.
6. There has been a notable decrease in long-term LOS individuals seen in the authority area, decreasing from 44 individuals in Q3 to 34 in Q4. This equates to a 26% decrease. However, it is worth noting that the overall percentage of long-term LOS from Q3 to Q4 has remained the same at 33%. The CoL LOS percentage is high in comparison to the overall Greater London figure, which is 11%.
7. The number of new rough sleepers seen within the quarter who refused to engage in support has reduced since Q3. In Q3 the City Outreach team recorded 16 individuals seen for the first time across the quarter as an 'unknown' individual. In Q4 there were only five unknown individuals met for the first time, and only a further five unknown clients who had been met in Q4 and in previous quarters. This means that, overall, the number of unknown individuals rough sleeping in the CoL has fallen in Q4. This reduction can be attributed to the persistence of the various outreach services working in the CoL to identify individuals.
8. The same can be said for the LOS figures. In Q4 only one individual moved from the new to rough sleeping group to LOS. However, the long-term LOS figure in Q4 reduced by 10, from 44 in Q3 to 34 in Q4. Each month saw positive outcomes for well-known clients, some of which had multiple agencies involved in providing support and input to their general wellbeing and care.
9. A total of 94 accommodation outcomes are recorded on the Combined Homelessness and Information Network (CHAIN) for Q4. This is an increase on the 72 recorded in the previous quarter.

10. A significant portion of accommodation outcomes in Q4 were recorded as Severe Weather Emergency Protocol (SWEP) local accommodation. There were 29 SWEP outcomes recorded in Q4 compared to only three in Q3.
11. The remaining Q4 accommodation outcomes were:
- 13 Carter Lane Hostel
 - two Private Rented Scheme
 - four CoL Temporary Accommodation
 - 43 Emergency accommodation (Travelodge)
 - three Pan London Emergency accommodation.
12. Chain data for the year shows that there were almost double the number of accommodation outcomes recorded in 2020/21 at 348 compared to 181 in 2019/20. Of those: 151 stays (43%) were in Local COVID-19 Emergency Accommodation; 68 stays (20%) were in Pan-London COVID-19 Emergency Accommodation; and 42 stays (12%) were in the Assessment Centre.
13. The City Outreach team supported two individuals to be reconnected back to the local authority they have links to.
14. There was an increase in the proportion of UK nationals sleeping rough in the CoL during Q4, from 58% in Q3 to 64% in Q4. The portion of UK nationals has continued to increase each quarter, whereas those from Central & East Europe (CEE) account for 16%, which is 14% less than in the previous quarter. While this may be an indication of a reduction in the number of EU nationals sleeping rough, it is important to note that accommodation outcomes for EU nationals have been high due to the COVID-19 response.
15. Support needs noted within the rough sleeping population has changed slightly from the previous quarter. Last quarter the most prevalent support needs were categorised as dual diagnosis, followed by mental health. Q4 shows that mental health is the most significant support need among the City rough sleeping population, with a 9% increase from last quarter. Further to this, CHAIN data for Q4 shows a lower percentage of individuals with drug, alcohol and dual diagnosis.

Proposals

16. There are no proposals arising from this paper.

Options

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

Corporate & Strategic Implications

18. There are no strategic or financial implications directly related to this report
19. Financial implications – N/A

- 20. Resource implications – N/A
- 21. Legal implications – N/A
- 22. Risk implications – N/A
- 23. Equalities implications – N/A
- 24. Climate implications – N/A
- 25. Security implications – N/A
- 26. Climate implications – N/A
- 27. Security implications – N/A

Conclusion

- 28. There was a demonstrable decrease in rough sleeping this past quarter compared to Q3, which is in line with the general trend seen over the past year and in neighbouring boroughs. There has been a marked reduction in unknown and LOS individual rough sleeping in the CoL thanks to the great work being carried out by City Outreach and all other support services in the borough. Accommodation outcomes continue to rise and, annually, this outcome has almost doubled since 2019/20.

Appendices

- Appendix 1 – CHAIN reporting dashboard.

Kirsty Lowe

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

T: 020 7332 3170

E: kirsty.lowe@cityoflondon.gov.uk



COL Quarter 4 2020/21 City of London Rough Sleeping Report RSSG

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

- This report updates Members on the level and nature of homelessness and rough sleeping activity within the City of London for the final quarter (Quarter 4) 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 in below:

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

Number of Rough Sleepers – comparing quarterly trends

	2019/20				2020/21				% change from previous quarter	2019/20	2020/21	% change from 2019/20 - 2020/21
Local Authority	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		Annual	Annual	
City of London	174	181	145	172	140	105	132	102	-23%	672	479	-29%
Southwark	142	195	201	197	221	145	197	137	-30%	735	700	-5%
Tower Hamlets	137	190	127	137	155	111	144	103	-28%	591	513	-13%
Camden	183	265	235	242	239	170	185	197	6%	925	791	-14%
Westminster	888	1097	768	834	710	900	692	647	-7%	3587	2949	-18%
Greater London	3172	3985	3637	3692	4227	3444	3307	3002	-9%	14486	13980	-3%

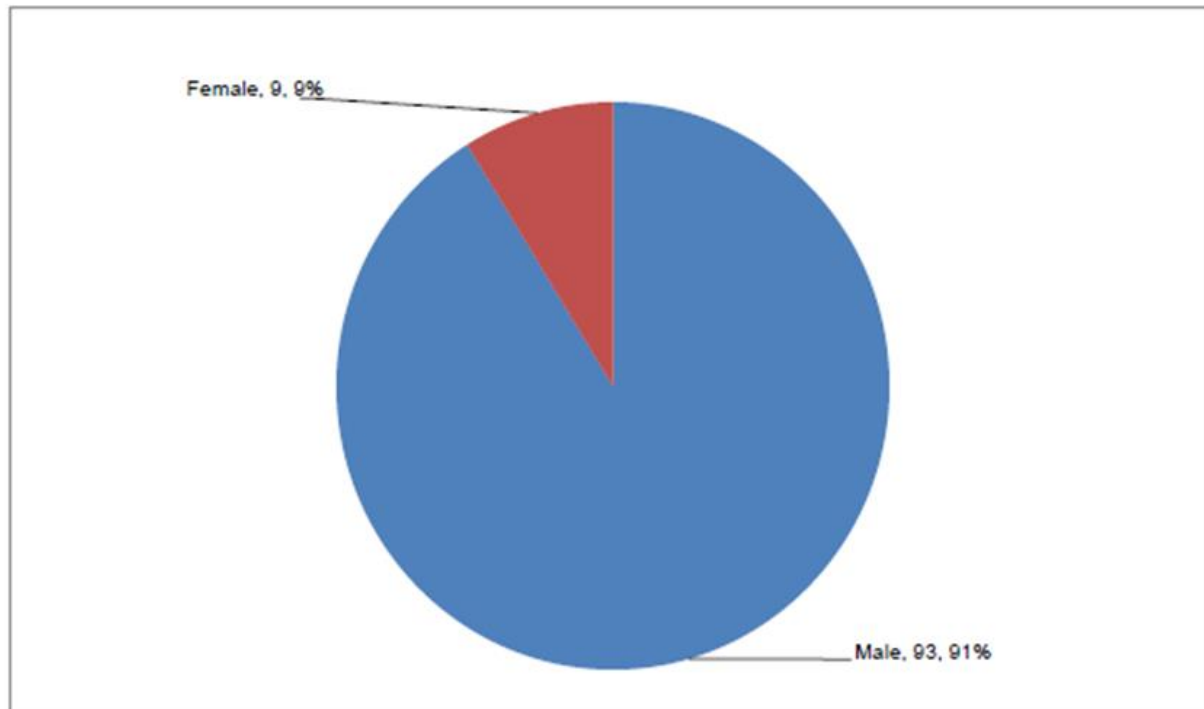
Composition of Rough Sleepers in Q4 2020/21

	Quarter 4 2020/21						Total (Change from Q3 2020/21)
	New rough sleepers	New Rough Sleepers - Joined LOS	Intermitte nt Rough Sleepers (returner)	Living on the Streets (All) Longer Term	LOS - RS205+ (entrench ed)	Total	
City of London	29	1	40	34	0	102	-30
Southwark	66	0	48	23	1	137	-60
Tower Hamlets	33	2	55	17	0	103	-41
Camden	67	0	107	23	0	197	12
Westminster	286	5	280	86	12	647	-45
Greater London	1567	25	1144	316	14	3002	-305

Gender of Rough Sleepers- Q4 2020/21

Gender

Gender of people seen rough sleeping by outreach services.

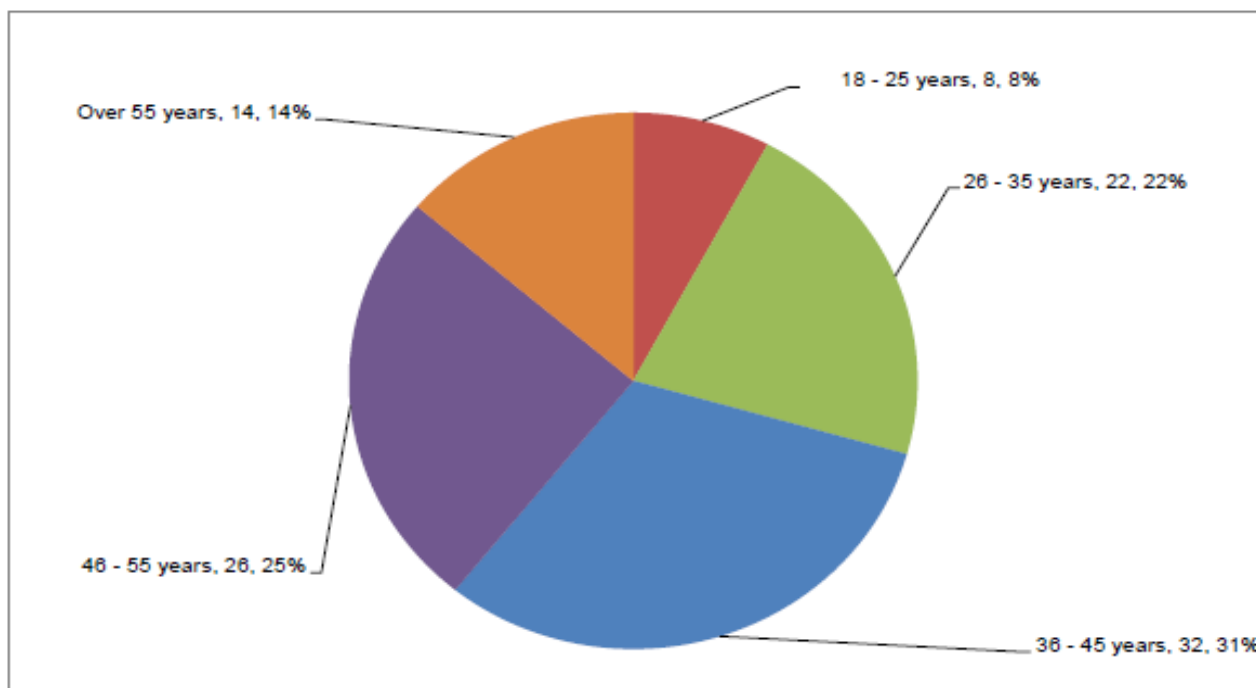


Base: 102 people seen rough sleeping whose gender was known.

Age of Rough Sleepers - Q4 2020/21

Age

Age of people seen rough sleeping by outreach services.

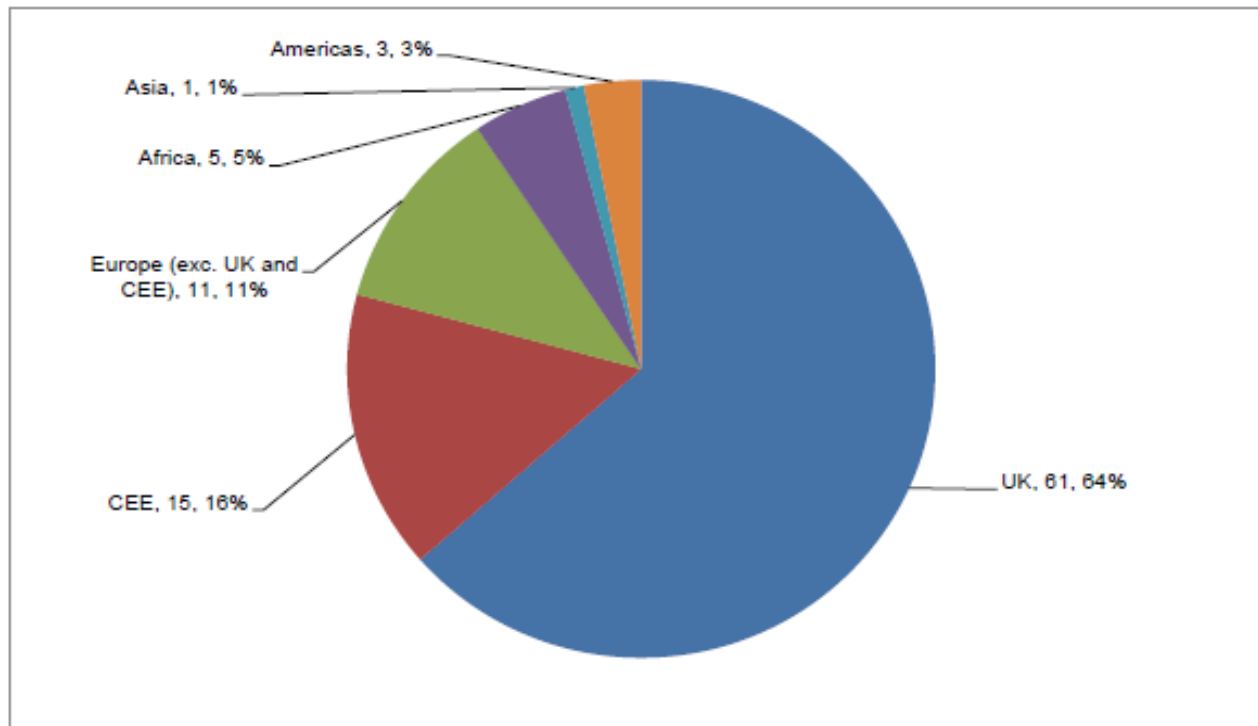


Base: 102

Nationality of COL Rough Sleepers - Q4 2020/21

Nationality: Breakdown by area

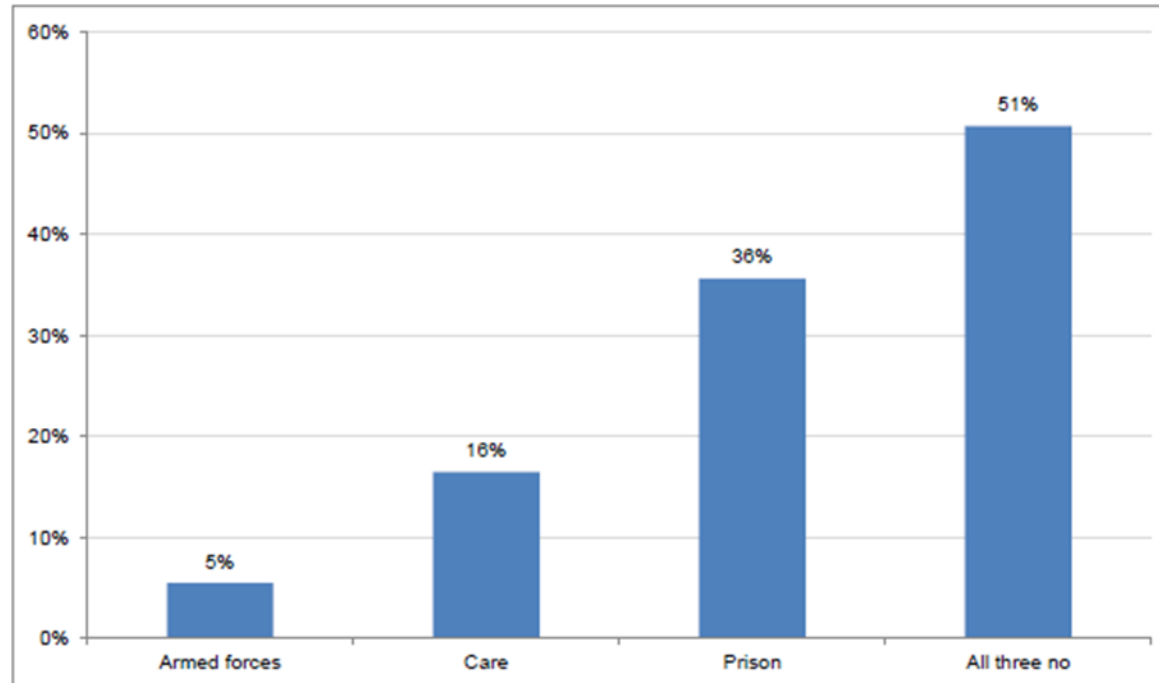
Nationality of people seen rough sleeping by outreach services, grouped by area.



Base: 96. Note that the base figure for this chart excludes clients whose nationality is not known or recorded.

Rough Sleepers by Institutional & Armed Forces background- Q4 2020/21

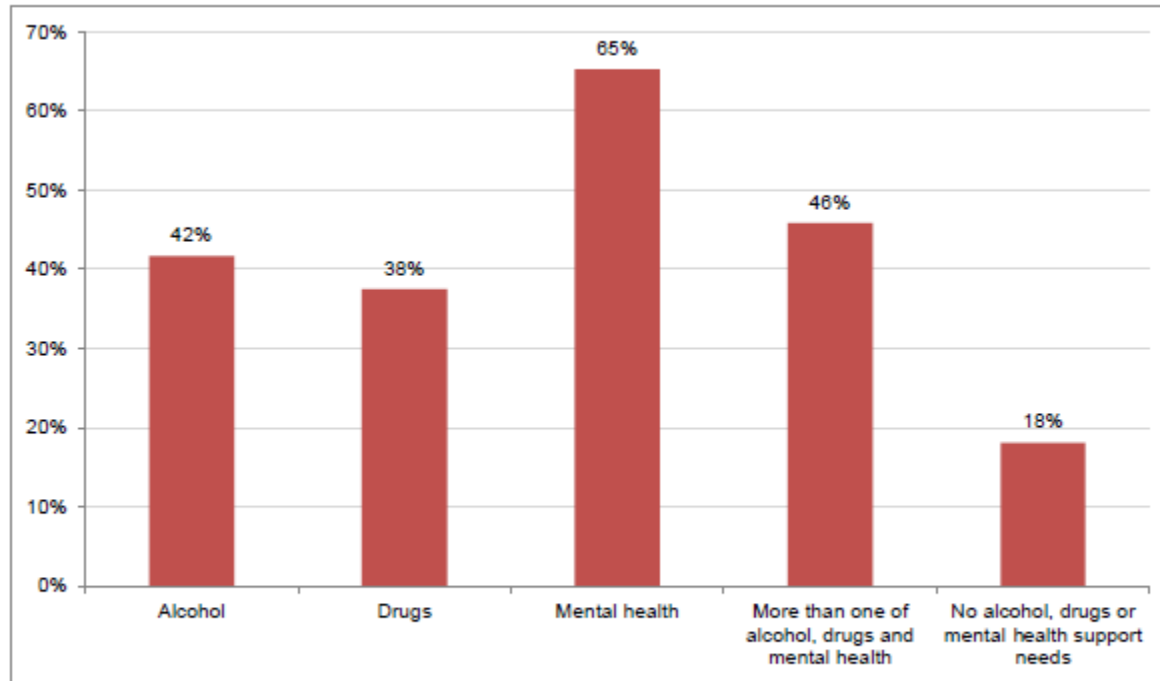
People seen rough sleeping by outreach services, by experience of armed forces, care or prison.



Base: 73. Note that the base figure for this chart excludes people for whom all three institutional histories are not known or not recorded.

Support needs of people sleeping rough - Q4 2020/21

Support needs of people seen rough sleeping by outreach services.

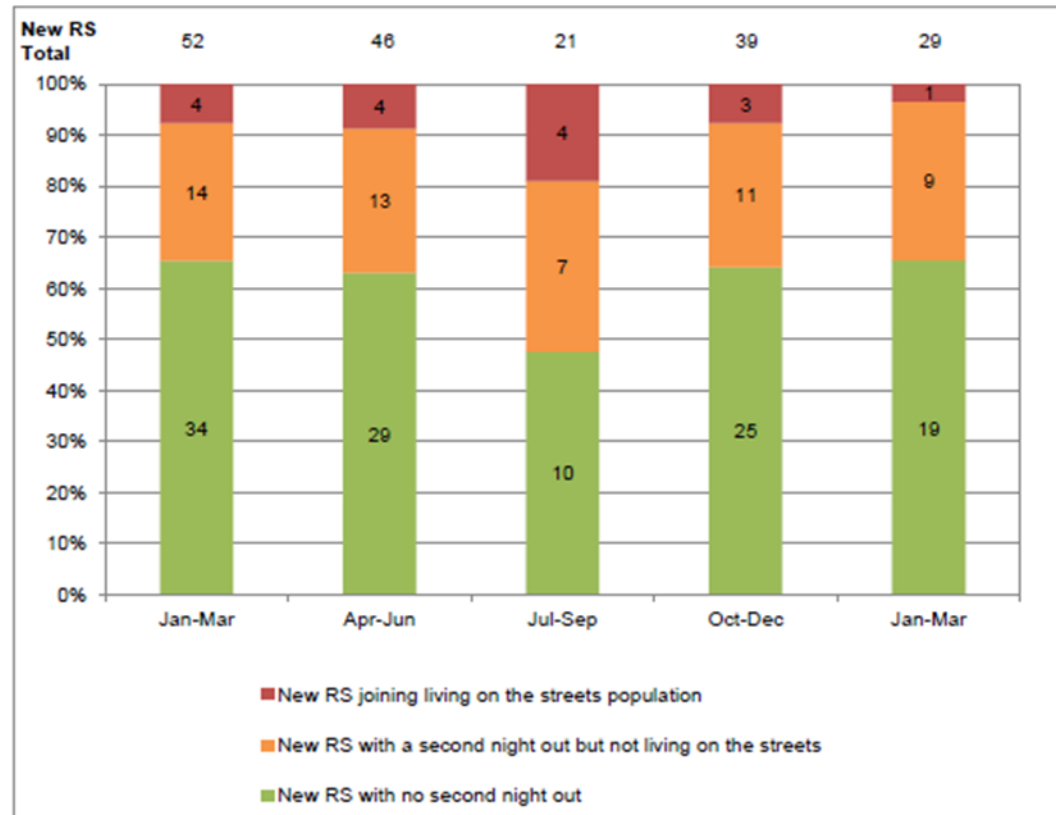


Base: 72. Note that the base figure for this chart excludes people for whom all three support needs are not known or not assessed (30)

New Rough Sleepers (Flow)

	2015/16	2016/17	2017/18	2018/19	2019/20	Q1 2020/21	Q2 2020/21	Q3 2020/21	Q4 2020/21	DOT
City of London	51.1%	52.8%	35.1%	47.8%	47.2%	32.9%	20.0%	29.5%	28.4%	↓
Greater London	65.2%	62.8%	59.5%	62.4%	65.8%	63.1%	55.2%	47.8%	52.2%	↑

City of London: Achieving No Second Night Out



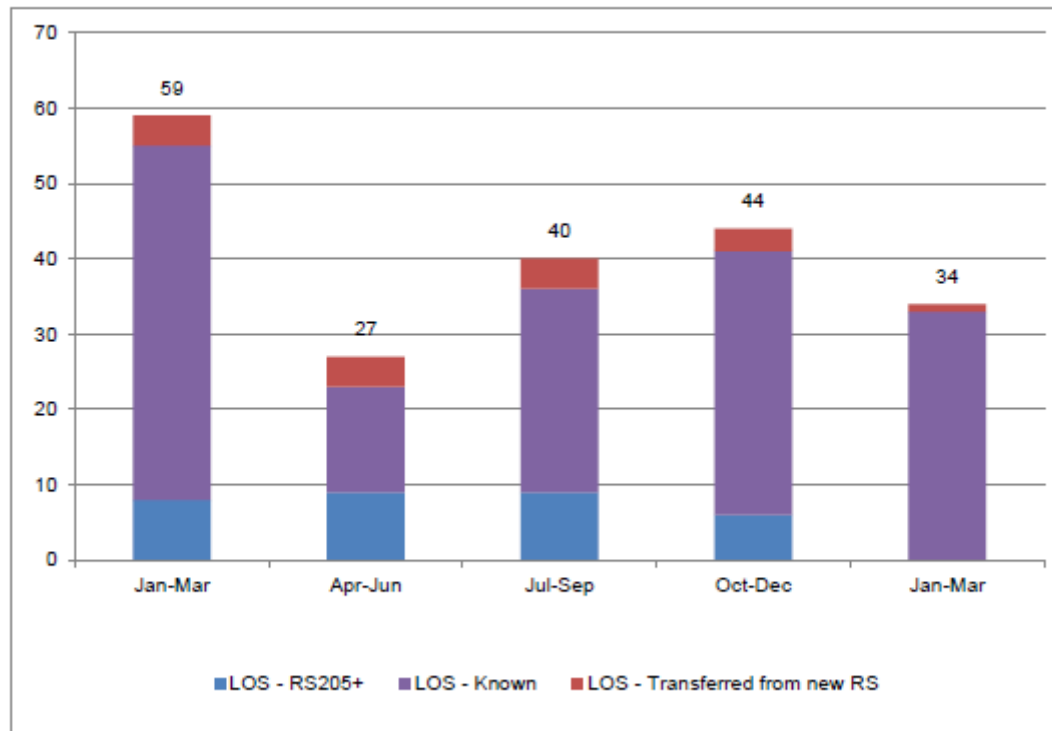
Percentage of new Rough Sleepers not spending a second night out (NSNO)

	2019/20				2020/21				
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Direction of travel (DOT)
City of London	63%	70%	40%	65%	63%	48%	64%	66%	↑
Southwark	70%	71%	77%	74%	62%	72%	73%	62%	↓
Tower Hamlets	84%	79%	42%	76%	81%	70%	74%	64%	↓
Camden	75%	74%	74%	66%	68%	81%	69%	81%	↑
Westminster	77%	87%	82%	87%	75%	72%	67%	80%	↑
Greater London	80%	80%	77%	79%	81%	77%	74%	78%	↑

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	Q3 2020/21	Q4 2020/21	DOT
City of London	36%	34%	48%	37%	32%	19%	38%	33%	33%	↔
Greater London	23%	24%	26%	24%	22%	6%	10%	12%	11%	↓

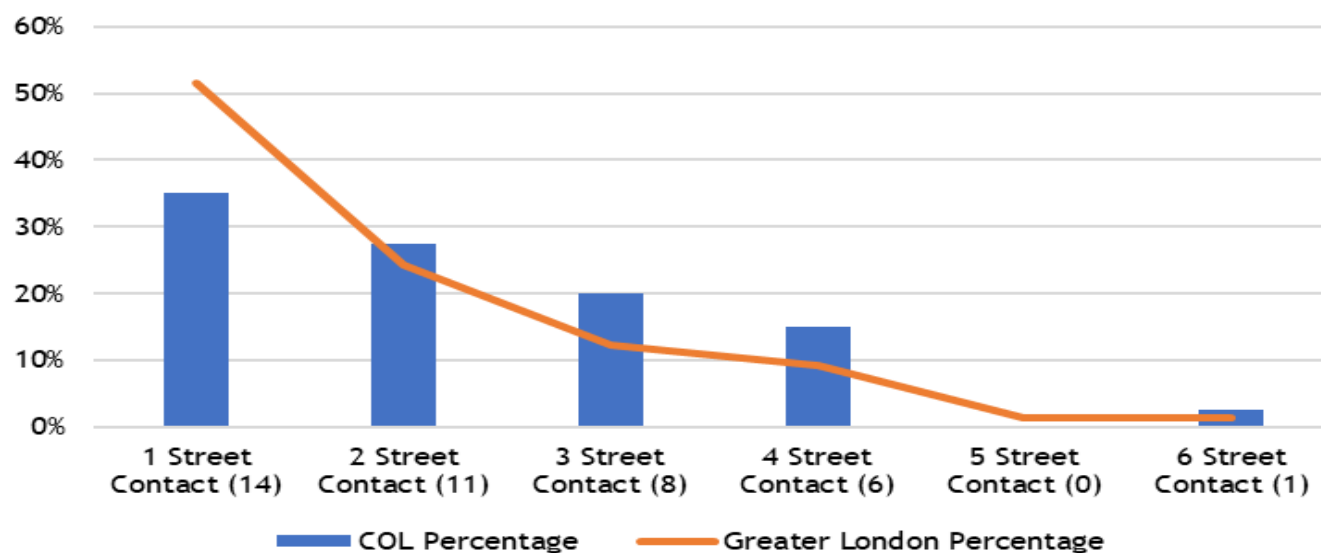
City of London: No One Living on the Streets



Intermittent Rough Sleepers (Returners)

	2019/20				2020/21					2019/20	2020/21	% change from 2019/20 - 2020/21
Intermittent Rough Sleepers (Returners)	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Direction of Travel	Annual	Annual	
City of London	63	63	53	65	71	48	52	40	ò	244	211	-14%
Southwark	65	89	71	80	81	55	63	48	ò	305	247	-19%
Tower Hamlets	54	87	63	72	67	53	68	55	ò	276	243	-12%
Camden	97	129	125	125	98	96	103	107	ñ	476	404	-15%
Westminster	311	355	332	360	297	356	357	280	ò	1358	1290	-5%
Greater London	1298	1504	1489	1495	1322	1239	1360	1144	ò	5786	5065	-12%

Number of bedded down street contacts - Q4 2020/21



Accommodation Outcomes by number of events

Accommodation	No. of stays				% share					
	2019/20		2020/21		2019/20		2020/21		Annual	
	Q3	Q4	Q3	Q4	Q3	Q4	Q3	Q4	2019/20	2020/21
Assessment Centre	0	0	24	13	0%	0%	33%	14%	0	42
Bed & breakfast	9	6	3	8	23%	11%	4%	9%	34	14
City Assessment Hubs	9	5	0	0	23%	9%	0%	0%	49	0
Clinic/detox/rehab	0	0	0	0	0%	0%	0%	0%	0	0
COVID-19 Emergency Accommodation (Local)	0	18	33	32	0%	33%	46%	34%	18	151
COVID-19 Emergency Accommodation (Pan-London)	0	8	1	4	0%	15%	1%	4%	8	68
Hostel	7	8	4	0	18%	15%	6%	0%	23	19
Long-term accommodation	2	2	3	2	5%	4%	4%	2%	8	13
No second night out	0	0	0	0	0%	0%	0%	0%	0	0
RSL Tenancy (General needs)	0	0	0	0	0%	0%	0%	0%	0	1
Second-stage accommodation	0	0	0	0	0%	0%	0%	0%	0	1
SWEP (Local)	1	1	3	29	3%	2%	4%	31%	2	32
SWEP (Pan-London)	0	0	0	0	0%	0%	0%	0%	0	0
Temporary accommodation (Local Authority)	4	7	1	4	10%	13%	1%	4%	29	5
Temporary accommodation (Other)	0	0	0	2	0%	0%	0%	2%	0	2
Winter/Night Shelter	7	0	0	0	18%	0%	0%	0%	10	0
Total Stay	39	55	72	94	39	55	72	94	181	348

Committee:	Dated:
Homelessness and Rough Sleeping Sub-Committee	28 June 2021
Subject:	Public
Homeless Link Immigration Pledge Appeal	
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,4,10
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 Discussion
Report author: Will Norman, Head of Homelessness Prevention and Rough Sleeping	

Summary

This report provides Members with an overview of the new Homeless Link Pledge Campaign. The campaign is a response to changes made to the Immigration Act in October 2020 and the subsequent code of guidance published by the Home Office. Homeless Link is asking the voluntary sector, local authorities and public sector bodies to sign up to a 'pledge campaign' in opposition to these changes and the operational implications.

Recommendation

Members are asked to comment and recommend further steps.

Should the Sub-Committee's recommendation be for the City of London Corporation to sign the Pledge Appeal, a report would need to be submitted to the Community and Children's Services Committee and thereafter Policy and Resources Committee for decision.

Main Report

Background

1. Changes to immigration rules pursuant to section 3(2) of the Immigration Act 1971 were published by the Government on 22 October 2020. Of the changes included in this document, the most pertinent are the changes related to rough sleeping as grounds for refusal.
2. New guidance titled '*Grounds for refusal – rough sleeping in the UK*' was published by the Home Office on 15 April 2021.

3. The guidance explains when an application for permission to stay may be refused, or any permission held may be cancelled on the grounds of rough sleeping in the UK. The guidance does not apply to:
 - those granted or eligible for pre-settled or settled status under the EU Settlement Scheme
 - those granted indefinite leave
 - those granted leave under a protection route (for example, as a refugee or on the grounds of human rights or for humanitarian protection).
4. The guidance explains that the new immigration rules set out a discretionary basis for the refusal of permission to stay, where the application was made on or after 1 December 2020, and for any permission held to be cancelled on the grounds of rough sleeping in the UK.
5. The rule was amended on 6 April 2021 to clarify that permission may only be refused or cancelled where a person has repeatedly refused suitable offers of support and engaged in persistent anti-social behaviour. This has become commonly referred to as the 'rough sleeping rule'.
6. Furthermore, the guidance states *that "The bar is set at 'unreasonably refusing to co-operate' so that it does not penalise those who have difficulty co-operating, for example because of poor mental health."* In reality, therefore, these provisions will apply to a very small proportion of the homeless population.
7. The Rough Sleeping Support Service (RSSS) was launched in 2018 as part of the Government's Rough Sleeping Strategy. The RSSS sits within the Immigration Enforcement Service. In the code of guidance, the Home Office explains that the RSSS has been '*... refreshed to provide clarity to organisations and individual rough sleepers as to how their data will be used*'. The RSSS can also support people to resolve their immigration status if they are sleeping rough.
8. The Home Office would like local authorities and police forces to be proactive in referring to the RSSS where individuals qualify under the rough sleeping rule criteria. This means someone would need to be:
 - a. rough sleeping
 - b. rejecting offers of support and assistance
 - c. perpetrating anti-social behaviour or crime.
9. Evidence would be required to determine all three criteria have been met. Where a police force is the source of a referral, the Home Office will consult with the applicable local authority to confirm the support and rough sleeping elements. It should be noted that, in Greater London, the Combined Homelessness and Information Network (CHAIN) is the source of rough sleeping records and rough sleeping status validation. Presently the Greater London Authority (GLA), who commission St Mungo's to deliver CHAIN, have not given permission for the CHAIN team to share data which will knowingly be used for this purpose.
10. It can be reasonably expected that individuals who come to the attention of the Home Office through this referral route might have any existing permission cancelled, should this fall within the limitations of the guidance.

11. The code of guidance gives due regard to considering cases on their individual merits and taking reasonable and proportionate action. A link to the guidance can be found here:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/978197/rough-sleeping-v1.0ext.pdf
12. Homeless Link are a member organisation and umbrella body which represent the homelessness and rough sleeping sectors. They develop best practice, provide training, advise on policy/law changes and lobby Government.
13. On 21 April 2021, Homeless Link published a response to the Immigration Act changes. This was followed by a pledge appeal asking charities and local authorities to sign a statement in opposition to the Immigration Act changes and to pledge to not use the referral mechanism to RSSS. A link to the pledge can be found here: <https://www.homeless.org.uk/stand-against-rough-sleeping-immigration-rules>

Current Position

14. This is a new change to legislation and a new code of guidance. Presently, all rough sleepers willing to engage with our commissioned services are assessed and a credible and safe offer which constitutes a route away from rough sleeping is developed with them.
15. Currently, service offers may include a safe return to a country of origin. To complete this process, we require the consent of the individual and a willingness to engage with the offer to its conclusion.
16. We do not require our commissioned providers to refer to the RSSS. City of London offers do not use or refer to the RSSS.
17. The Homeless Link pledge has been widely adopted by the voluntary sector. Presently, three local authorities (Southwark, Islington and Lewisham) have signed, as well as the GLA.
18. Although we enjoy close partnership arrangements with colleagues in City of London Police and the Community Safety Team, crime and anti-social behaviour are handled separately to offers of accommodation and support – that is, one is not dependent on the other. Where persistent anti-social behaviour is perpetrated by a rough sleeper, we may support enforcement actions in parallel to offering assistance and accommodation. Decisions about how and when to take enforcement actions forward are always taken through multi-agency consensus.
19. The number of individuals affected is difficult to quantify, however, allowing for the fact that some cases carry over from the previous year, we anticipate three to five cases meeting all three criteria in any given year.

Proposals

20. This report is for discussion at the Homelessness and Rough Sleeping Sub-committee. Members are asked to consider and recommend next steps.
21. Should the Sub-Committee's recommendation be for the City of London Corporation to sign the Pledge Appeal, a report would need to be submitted to the Community and Children's Services Committee and thereafter Policy and Resources Committee for decision.

Options

22. The City of London Corporation may wish to sign up to the Homeless Link pledge campaign. This would state our intention not to use the RSSS referral mechanism and confirm the City of London's position in opposition to the changes to the Immigration Act.
23. The City of London Corporation may elect to not sign the campaign. This would not indicate a policy position either way. Options to use or not use the RSSS referral mechanism remain a discretionary matter.

Corporate & Strategic Implications

24. *Strategic implications* – This proposal relates to national and central Government objectives to halve rough sleeping by 2022 and end it entirely by 2027. Consideration should also be given to Corporate Plan objectives relating to contributing to a flourishing society and shaping outstanding environments.
25. *Financial implications* – this is difficult to quantify and depends largely on the number of individuals who might qualify for referral in future months and years, and who are, in turn, not referred if the pledge campaign is signed. Rough sleeping is known to harm physical and mental health; therefore, it might reasonably be assumed that a small number of individuals will live for longer periods of time on the street. Should their care and support needs cause concern, we may need to act with urgency. This group will have no recourse to public funds and costs will be met by local risk.
26. *Resource implications* – there are none directly linked with this report.
27. *Legal implications* – instructions were given to external counsel who have provided written advice. Some key points are as follows:
 - *any decision to sign up to the Pledge (or not) is a political decision and is likely to have considerably more political significance than legal consequences*
 - *the primary purpose of the Pledge is not to create a legally enforceable 'contract' but to send out a message to re-assure potential clients that their status will not be jeopardised*
 - *as a matter of law, the Pledge would not.... amount to a promise that would be legally enforceable in any meaningful way*
 - *whereas there is no legal impediment to a local authority deciding not to refer in any individual case, adopting the Pledge would in effect create a policy that, irrespective of the facts of any particular case, no referral will be made*

- *there is always a danger in adopting a policy that places a blanket prohibition on what would otherwise be a discretion that it may amount to an unlawful ‘fettering’ of that discretion. Where a public body has a discretion, a policy as to how that discretion is to be exercised must not be followed so slavishly as to preclude the possibility of departing from the policy in any particular case*
- *it is conceivable that if there were a case where it was considered by the authority that a referral was necessary or preferable, it may be open to the person affected to try to challenge that decision on the basis that the policy was not followed*
- *a policy not to refer in any case must be implemented lawfully, using the proper procedure and taking into account the relevant considerations*
- *the pledge itself does not create a legally enforceable promise, however, the adoption of a policy not to refer in any case is something that could give rise to a potential public law challenge if it were not followed or, conversely, a challenge on the basis that in following the policy too slavishly, the local authority had fettered its discretion.*
- *In reality the chances of a successful challenge may not be particularly high, but, nevertheless, these implications are worth bearing in mind.*

28. *Risk implications* – there is a degree of reputational risk to each option. The measures outlined in the guidance and the referral mechanism to RSSS are linked to the Government’s Rough Sleeping Strategy. This states an intention to halve rough sleeping by 2022 and end it by 2027. These options are at the disposal of local authorities in support of this aim.

29. Three local authorities and the GLA have already signed. It is possible there may be more, but they have elected not to advertise their logo on the Homeless Link website (an option).

30. *Equalities implications* – an equalities impact assessment has not been undertaken at this time. This report is primarily concerned with providing Members with the contextual information required relating to the decision as to whether or not to sign the Homeless Link Pledge Campaign. In the event our practice changes and we intend to use the RSSS service, it may be necessary to carry out such an assessment at that time.

31. *Climate implications* – there are none directly linked with this report.

32. *Security implications* – there are none directly linked with this report.

Conclusion

33. The Homeless Link Pledge Campaign asks local authorities to make a commitment to non-co-operation with the Home Office Immigration Service and RSSS. This commitment has already been made by a small number of councils.

34. The implication for the City of London in signing up to the campaign affects a small number of rough sleepers with no recourse to public funds, who are perpetrating anti-social behaviour and not engaging with outreach services.

35. Assistance for this group would be limited to emergency assistance should care and support needs escalate to the point where action is deemed necessary. The cost of assisting would fall to the City of London.

36. Legal advice points out that the decision to sign or not sign the Pledge Campaign is a political rather than legal one. Any legal implications are linked to the consequences of signing such a pledge due to the required change in operating practice.
37. Legal advice points out that there is no obligation to use the referral mechanism, therefore a policy of non-cooperation could be considered a fettering of this discretion.
38. Should the Pledge Campaign be signed, and a subsequent decision be made that a referral to RSSS is required, a challenge that policy has not been followed could result.

Appendices

- Appendix 1: Homeless Link Pledge Campaign: Legal Opinion

Will Norman

Head of Homelessness Prevention and Rough Sleeping

E: will.norman@cityoflondon.gov.uk

T: 077 0137 2884

RE: HOMELESS LINK PLEDGE CAMPAIGN

OPINION

1. I am asked to advise the City of London with regard to the legal implications of signing up to a 'Pledge' proposed by Homeless Link to the effect that it will not co-operate in referring homeless persons to the Home Office.
2. I must say at the outset that any decision to sign up to the Pledge (or not) is a political decision and is likely to have considerably more political significance than legal consequences. This Opinion is concerned solely with the legal implications.

BACKGROUND

3. On 1 December 2020, the Immigration Rules were amended to provide a discretionary basis for the refusal of permission to stay in the UK (where the application was made after 1/12/2020) and for any permission to be cancelled on the grounds of rough sleeping in the UK.
4. The provisions are set out in paragraphs 9.21.1 ad 9.21.2 of the Rules:

Rough sleeping in the UK

9.21.1. Permission to stay may be refused where the decision maker is satisfied that a person has been rough sleeping in the UK and has repeatedly refused offers of suitable support and has engaged in persistent anti-social behaviour.

9.21.2. Where the decision maker is satisfied that a person has been rough sleeping in the UK and has repeatedly refused offers of suitable support, and has engaged in persistent anti-social behaviour, any permission held by the person may be cancelled.

5. On 6/4/2021, the Rules were amended to clarify that "*permission may only be refused or cancelled where a person has repeatedly refused suitable offers of support and engaged in persistent anti-social behaviour*".
6. Consequential to these changes, the Home Office has provided guidance (15/4/2021) to its immigration officers on how these provisions should be implemented.

WHO WILL BE EFFECTED BY THE CHANGES – Status

7. The guidance states that it does not apply to:
 - those granted or eligible for pre-settled or settled status under the EU Settlement Scheme (EUSS)
 - those granted indefinite leave
 - those granted leave under a protection route (for example as a refugee or on the grounds of human rights or for humanitarian protection)
8. In particular, it is stated that "*any EU, EEA or Swiss citizen or their family member who has EUSS status or is eligible to apply for status must not have that leave cancelled on the basis of rough sleeping.*"

WHO WILL BE EFFECTED BY THE CHANGES – Rough Sleepers

9. The guidance states that *"The introduction of rough sleeping as a ground for the refusal or cancellation of permission is not intended to criminalise rough sleeping or to penalise those who inadvertently find themselves temporarily without a roof over their head*

...

The rule will be applied to those who refuse to engage with the range of available support mechanisms and who engage in persistent anti-social behaviour."

10. The guidance recognises that *"Not every rough sleeper will be eligible for statutory support and many migrant rough sleepers will have a condition attached to their leave prohibiting access to public funds. Depending on the person's immigration status there may be limits on the help a local authority can provide where the person is ineligible for homelessness assistance.*

...

You cannot refuse or cancel permission to remain in the UK under the rough sleeping rule where a person hasn't refused support because none has been offered ... because they are not eligible for support."

11. Furthermore *"The bar is set at 'unreasonably refusing to co-operate' so that it does not penalise those who have difficulty co-operating, for example because of poor mental health."*

12. In reality, therefore, these provisions will apply to a very small proportion of the homeless population.

ROLE OF LOCAL AUTHORITIES

13. The Guidance states that *"Local authorities are likely to know rough sleepers in their area and where there is anti-social behaviour will refer them to the police.*

...

A non-UK national who is encountered sleeping rough may be referred to Immigration Enforcement's National Command and Control Unit by either the police, following a referral from the local authority, or directly from a local authority because of their offending or anti-social behaviour and where the person has failed to co-operate with offers of support."

14. It is clear from this that there is no obligation on a local authority to make a referral.

HOMELESS LINK POSITION

15. Homeless Link, a 'national membership charity for organisations working directly with people who become homeless in England', are opposed to the new rules and are asking homelessness organisations and local authorities to sign up to a 'pledge' in the following terms:

- That in order to assist the national effort to end rough sleeping we will make no direct referrals under the rough sleeping Immigration Rules
- The council will also not require any of our commissioned partners to make referrals or pass data to the Home Office under the Immigration rules.
- The council will only share information and data with the Home Office with the explicit and informed consent of the individual.

16. Reading the material provided by Homeless Link, it seems clear that they appreciate that the effect of these provisions is considerably more limited than the headlines might imply. It seems that their primary concern is that people will not approach the relevant services for help if they think, rightly or wrongly, that they are in jeopardy of losing their status.

THE LEGAL EFFECT OF THE PLEDGE

17. In light of the above, it seems that the primary purpose of the Pledge is not to create a legally enforceable 'contract' but to send out a message to re-assure potential clients that their status will not be jeopardised.

18. Indeed, as a matter of law, the Pledge would not in my opinion amount to a promise that would be legally enforceable in any meaningful way.

19. The key issue however is that, whereas there is no legal impediment to a local authority deciding not to refer in any individual case, adopting the Pledge would in effect create a policy that, irrespective of the facts of any particular case, no referral will be made.

20. Unlike, say, a voluntary sector organisation or charity, a local authority is an organ of government and its decision-making must be done in accordance with the principles of public law. Every decision of a local authority must be 'lawful'. This means that proper processes must be followed, the decision-maker must take into account all relevant considerations and the decision must be 'rational'.

21. Government Guidance is generally considered to be 'relevant consideration' in public law decision making. This does not mean it has to be followed but it does mean it has to be accorded due weight and any decision that goes against it must be justifiable. In this particular case, the Guidance is provided to Immigration Officials and not to Local Authorities so the weight it carries may be less significant.

22. In this case there are the opposing considerations of, on the one hand, the government's aim of reducing problems of antisocial behaviour associated with rough sleepers and, on the other, the danger that a wider group of vulnerable people will not come forward to access services that are available for them. Any decision to adopt a policy of not referring would have to balance these and any other relevant considerations.

23. Furthermore, there is always a danger in adopting a policy that places a blanket prohibition on what would otherwise be a discretion that it may amount to an unlawful 'fettering' of that discretion. Where a public body has a discretion, a policy as to how that discretion is to be exercised must not be followed so slavishly as to preclude the possibility of departing from the policy in any particular case. (R v Home Department ex p Venables [1985] AC 407)

24. Conversely, it is conceivable that if there were a case where it was considered by the authority that a referral was necessary or preferable, it may be open to the person affected to try to challenge that decision on the basis that the policy was not followed. I don't say that such a challenge would be effective, but it is conceivable.

CONCLUSION

25. The first important point to note is that it is for the Home Office and not the local authorities to determine if, and to what extent, the new rules should be applied in any given case.
26. It is clear from the guidance that it will not apply to the majority of homeless persons.
27. The guidance provides that a non-uk rough sleeper may be referred by the local authority (among other possible referral routes). There is no requirement or obligation that a local authority must make a referral. There is, therefore, no legal impediment to the local authority deciding not to make a referral in any given case.
28. However, a policy not to refer in any case must be implemented lawfully, using the proper procedure and taking into account the relevant considerations.
29. In my opinion, the pledge itself does not create a legally enforceable promise, however, the adoption of a policy not to refer in any case is something that could give rise to a potential public law challenge if it were not followed or, conversely, a challenge on the basis that in following the policy too slavishly, the local authority had fettered its discretion.
30. In reality the chances of a successful challenge may not be particularly high, but, nevertheless, these implications are worth bearing in mind.
31. Please do not hesitate to contact me if you want to discuss further.

Sean Pettit

Five Paper

9/6/2021

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

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