



## Homelessness and Rough Sleeping Sub Committee

**Date:** MONDAY, 9 DECEMBER 2024

**Time:** 4.00 pm

**Venue:** COMMITTEE ROOMS - 2ND FLOOR WEST WING, GUILDHALL

**Members:**

Eamonn Mullally (Chair)	Henrika Priest
Deputy Natasha Maria Cabrera Lloyd-Owen (Deputy Chair)	Deputy Alpa Raja
Anne Corbett	Ruby Sayed (Ex-Officio Member)
Helen Fentimen OBE JP (Ex-Officio Member)	Robert Atkin, Safer City Partnership
Deputy Shravan Joshi MBE	Paul Kennedy, City Churches
Judith Pleasance	

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**Ian Thomas CBE**  
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 9 September 2024.

**For Decision**  
(Pages 5 - 12)

4. **CITY OF LONDON POLICE UPDATE**

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

**For Information**  
(Pages 13 - 14)

5. **HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023–2027 UPDATE REPORT**

Report of the Executive Director, Community & Children's Services.

**For Information**  
(Pages 15 - 34)

6. **CITY OF LONDON RESPONSE TO THE MINISTERIAL LETTER ON ROUGH SLEEPING**

Report of the Executive Director, Community & Children's Services.

**For Information**  
(Pages 35 - 52)

7. **TACKLING THE DETRIMENTAL IMPACTS OF ROUGH SLEEPING – DRAFT PROPOSALS**

Report of the Executive Director, Community & Children's Services.

**For Discussion**  
(Pages 53 - 72)

8. **POST ROUGH SLEEPING INITIATIVE (RSI) PLANNING UPDATE REPORT**

Report of the Executive Director, Community & Children's Services.

**For Information**  
(Pages 73 - 76)

9. **STATUTORY HOMELESSNESS - USE OF TEMPORARY ACCOMMODATION REPORT**

Report of the Executive Director, Community & Children's Services.

**For Information**  
(Pages 77 - 90)

10. **HOMELESSNESS ROUGH SLEEPING COPRODUCTION PROGRAMME – INTRODUCTION REPORT**

Report of the Executive Director, Community & Children's Services.

**For Information**  
(Pages 91 - 94)

11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB-COMMITTEE**

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

13. **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**

14. **NON-PUBLIC APPENDIX**

Appendix 3 to be read in conjunction with item 5 of the agenda.

**For Information**  
(Pages 95 - 96)

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

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

**For Information**

16. **UNDERSTANDING AND RESPONDING APPROPRIATELY TO THE STEADY RISE IN THE NUMBER OF ROUGH SLEEPERS IN THE CITY OF LONDON**

Executive Director, Community & Children's Services to be heard.

**For Discussion**

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**

## HOMELESSNESS AND ROUGH SLEEPING SUB COMMITTEE

Monday, 9 September 2024

Minutes of the meeting of the Homelessness and Rough Sleeping Sub Committee held at the Guildhall EC2 at 4.00 pm

### Present

#### Members:

Eamonn Mullally (Chair)

Anne Corbett

Helen Fentimen OBE JP (Ex-Officio Member)

Henrika Priest

Deputy Alpa Raja

#### In Attendance:

Judith Pleasance

Munsur Ali

#### Officers:

John Barker

Simon Cribbens

Chief Inspector Nikki Gander

Kirsty Lowe

Will Norman

Chris Pelham

Blair Stringman

- Chamberlain's Department

- Community & Children's Services Department

- City of London Police

- Community & Children's Services Department

- Community & Children's Services Department

- Community & Children's Services Department

- Town Clerk's Department

### 1. **APOLOGIES**

Apologies were received from the Deputy Chair, Natash Maria Cabrera Lloyd-Owen and Deputy Shravan Joshi and Ruby Sayed.

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

There were no declarations.

### 3. **MINUTES**

**RESOLVED** – That, Members agree the public and non-public summary of the minutes of the meeting held on 10<sup>th</sup> June 2024.

#### **MATTERS ARISING:**

- The chair welcomed the external members designate, Patrick Fowler and James Breed who joined as observers on this occasion.

### 4. **CITY OF LONDON POLICE UPDATE**

The Sub-Committee heard the Commissioner of the City of London Police.

The following points were noted:

- Members noted there is a three-stage method to address begging and assess the vulnerability of rough sleepers in the City of London. It includes a support and intervention hub held fortnightly at St Botolph's Church, attended by various organisations.
- It was noted this approach uses a traffic light scheme for issuing tickets to those found begging:
  - **Green ticket:** Warning not to beg within the city for 12 months.
  - **Amber ticket:** Issued if caught begging again.
  - **Red ticket:** Further offenses can lead to a criminal behaviour order (CBO).
- Since April 1, 2024, there have been 13 green tickets, 3 amber tickets, and 1 red ticket issued.
- One CBO has been obtained, resulting in a five-year order with specific requirements around behaviour and begging.
- Hub attendance has been lower recently, with most attendees being frequent users who come for food and hot drinks.
- Invitations to the hub are extended to those found rough sleeping, aiming to provide support.
- The hub is essential for the Luscombe model, ensuring a welfare-based approach with support before enforcement.
- Proactive operation Luscombe days are conducted when the hub is open, referring those begging or rough sleeping to the hub for immediate support.
- The City of London Police and Corporation work together to address issues related to rough sleeping, using the community MARAC to coordinate a welfare-based response while addressing any criminal or antisocial behaviour.
- Members were informed that Tickets are warning cards, not fines. Escalation can lead to a red card for enforcement and criminal behaviour orders.
- Members raised concerns about what is happening at the encampment in Castle Baynard st plus hotspots at 65 Fleet St and Gough Sq. Officers confirmed that they were in contact with the named locations.
- CoLP made an offer to Members to attend the fortnightly Hub at St Botolphs, Bishopsgate explaining it takes place fortnightly with planned events every second Wednesday
- Officers confirmed they are looking at alternative offers of support to Luscombe.

## 5. **HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-27 UPDATE REPORT**

The Sub-Committee received a report of the Executive Director, Community & Children's Services, concerning a summary of progress against the aims set out in the Homelessness and Rough Sleeping Strategy 2023-27.

The following points were noted:

- The strategy focuses on preventing homelessness, providing rapid rehousing, and ensuring that rough sleeping is rare, brief, and non-

recurring. It aims to deliver tailored support to individuals based on their specific needs.

- Collaboration with various partners, including local authorities, health services, and voluntary organisations, is emphasised to provide comprehensive support to those experiencing homelessness and rough sleeping.
- The strategy outlines the importance of delivering high-quality services that are accessible and responsive to the needs of individuals. This includes outreach services, emergency accommodation, and long-term housing solutions.
- Regular monitoring and evaluation of the strategy's implementation are planned to ensure its effectiveness and to make necessary adjustments based on feedback and outcomes.
- The strategy acknowledges the need for adequate funding and resources to achieve its objectives. It highlights the importance of securing financial support from various sources, including government grants and charitable donations.
- Engaging with the community and raising awareness about homelessness and rough sleeping are considered crucial for the strategy's success. This includes involving local residents, businesses, and other stakeholders in efforts to address these issues.
- Officers explained that LSE (London School of Economics) has an entrepreneur program addressing socio-economic issues and offering practical solutions. They are collaborating on four challenges but haven't worked with academic staff yet.
- Members mentioned the issue of low housing stock in the city and the need for more information to feed into the housing strategy
- Officers agreed to provide more details on the focus of the work with LSE and proposed areas of enquiry and consider bringing a paper to expand on the points discussed.

#### 6. **ROUGH SLEEPING ANNUAL PERFORMANCE REPORT 2023–2024**

The Sub-Committee received a report of the Executive Director, Community & Children's Services, concerning an introduction to the Annual Combined Homelessness and Information Network (CHAIN) report for rough sleeping in 2023–2024.

The following points were noted:

- Officers noted that rough sleeping has increased in the City of London as well as across Greater London. Officers drew Members attention the 'returner' cohort for whom there had been notable success during the last year with a steady reduction in accommodated individuals returning to rough sleeping in the Square Mile.
- The success of various support services, including emergency accommodation, mental health support, and substance misuse services was highlighted to Members. It was noted that these services played a

crucial role in helping individuals transition from rough sleeping to more stable living conditions.

- Collaboration with partner organisations, such as Thames Reach and Turning Point, was emphasised as a key factor in the success of the rough sleeping strategy. Members were informed that these partnerships enabled a coordinated approach to addressing the needs of rough sleepers.
- However, despite the successes, Members acknowledged ongoing challenges, including the increasing complexity of cases and the need for more affordable housing options. Officers also noted the impact of external factors, such as economic conditions and changes in government policy, on the ability to address rough sleeping effectively.
- A question was raised about the significant increase in COL and the drivers behind it. Officers responded that it is not a unique situation and that the area is well-resourced with outreach teams working shifts every day and evening.
- Members noted the emphasis on the importance of support into long-term accommodation and the quality of work being done.
- Officers highlighted that those rough sleeping are not existing residents but coming from outside, and questioned what can be done as a deterrent.
- Officers pointed out homelessness and rough sleeping is a nationwide issue, not just limited to London, and that collaboration across boroughs is critically important.
- Officers agreed to clarify data relating to private rented sector outcomes and the split between statutory homelessness and rough sleeping.

## 7. **POST ROUGH SLEEPING INITIATIVE PLANNING PROPOSAL REPORT**

The Sub-Committee received a report of the Executive Director, Community & Children's Services, concerning an update on our planning and risk mitigation for the period after the current tranche of Rough Sleeping Initiative (RSI) funding expires on 31 March 2025.

The following points were noted:

- Officers noted the need to continue providing support services to individuals who have experienced rough sleeping. This included ongoing access to mental health services, substance misuse support, and housing assistance.
- Members were informed of the importance of securing long-term housing solutions for individuals transitioning from rough sleeping. This involves working with housing providers to increase the availability of affordable housing options.
- Officers highlighted that collaboration with partner organisations, such as local authorities, health services, and voluntary organisations, is crucial for the success of the initiative.
- Members were informed that regular monitoring and evaluation of the initiative's implementation are planned to ensure its effectiveness. This



includes collecting data on outcomes and making necessary adjustments based on feedback and results.

- It was noted that engaging with the community and raising awareness about the challenges faced by individuals who have experienced rough sleeping are considered essential for the initiative's success. This includes involving local residents, businesses, and other stakeholders in efforts to support these individuals.

#### **8. ROUGH SLEEPING SERVICE REVIEW PROPOSAL REPORT**

The Sub-Committee received a report of the Executive Director, Community & Children's Services, concerning a proposal for an independent review of the pathways offered by the City of London to rough sleepers encountered by its services.

The following points were noted:

- Officers highlighted the proposal emphasises the need for a comprehensive evaluation of existing rough sleeping services. This includes assessing the effectiveness of current programs and identifying areas for improvement.
- Members were informed the proposal outlines plans for collecting and analysing data on rough sleeping trends, service usage, and outcomes. This information will be used to inform future service planning and delivery.
- It was noted that the proposal stresses the need for adequate resources to support the delivery of rough sleeping services. This includes securing funding and ensuring that resources are allocated effectively to meet the needs of service users.
- Members asked that residents associations be consulted as stakeholders.

#### **9. MEMBER ASSURANCE PROPOSAL REPORT**

The Sub-Committee received a report of the Executive Director, Community & Children's Services, concerning proposal for a structured approach to help Members gain insights into and assurance about the delivery of frontline rough sleeping work.

The following points were noted:

- Officers noted the programme aims to provide assurance to Members regarding the effectiveness and efficiency of services provided to individuals experiencing homelessness and rough sleeping.
- Officers added that regular contract monitoring arrangements are in place to ensure they meet the needs of service users and are delivered effectively. This includes assessing the quality of services and identifying areas for improvement.
- A Member noted the need to improve the information provided to constituents about rough sleepers in the city asking for detailed case studies for members and constituents, reminding officers that this had

been previously mentioned. Officers agreed to change the report format and consult members about the presentation of the information.

- Officers informed Members that dates for walkabouts were being considered and Members would be informed when they will take place, officers added that they intended to schedule them evenly throughout the year, considering engagement levels.

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

There were no questions.

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

There was one item of business.

- Officers informed Members that they intended to bring a report to the Community & Children's Services Committee setting out the direction of travel regarding tents and encampments and how the Corporation might respond. Officers noted the absence and need of an approved policy position and protocol setting out the circumstances for conditionality for the use of powers, if that is supported. Officers stressed that it is important for people to understand the ongoing commitment to a welfare-first approach to support homeless people, but recognise there can be detrimental impacts for the wider community where support is not taken up and where there may be issues of anti-social behaviour.

**12. EXCLUSION OF THE PUBLIC**

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

**13. NON-PUBLIC MINUTES**

**RESOLVED**, that the non-public minutes of the meeting held on 10 June 2024 be approved.

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

The Sub-Committee heard the City of London Commissioner.

**15. NON-PUBLIC APPENDIX CONCERNING ITEM 6**

The Sub-Committee received the non-public appendices concerning item 6 of the agenda.

**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 no other business.

a) **Assessment Centre for Rough Sleepers**

The Sub-Committee received a joint report of the City Surveyor & Executive Director, Community & Children's Services.

**The meeting closed at 5.12 pm**

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Chairman

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<b>Meeting:</b> City of London Homeless and Rough Sleeper Sub Committee	<b>Date(s):</b> 9 <sup>th</sup> December 2024	<b>Item no.</b> 4
<b>Subject:</b> City of London Police update on Rough sleeping and begging in the City		
<b>Report of:</b> Chief Inspector Nikki Gander		
<b>Document Classification:</b> Official		
<b>For Information/Decision:</b> Information		

**Op Luscombe** is a three-stage approach created not only to deal with begging but also assess vulnerability of people rough sleeping in the City by offering support at an intervention hub. This partnership hub takes place fortnightly at St Botolph’s Church Hub with Turning Point and Thames Reach/Out-Reach Team in attendance with CoLP and Parkguard. This approach is currently being reviewed by City of London Corporation. On average five people attend the Hub. This is also somewhere for people to get food and other support functions.

Tickets issued since April 2024

20 green tickets (Invitation to the hub)

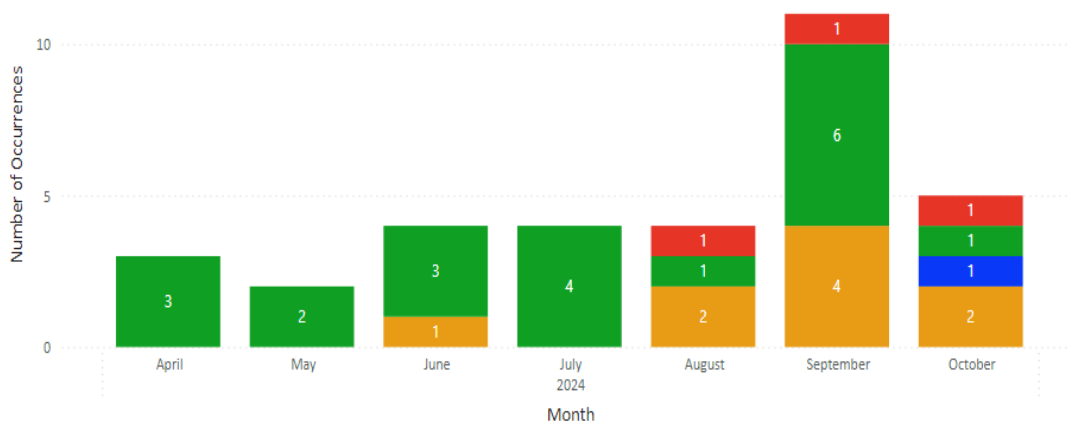
9 amber tickets (Equivalent of a Community Protection Warning)

3 red tickets (Equivalent of a Community Protection Notice)

1 blue tickets (Reported for begging offence)

Op Luscombe Tickets Issued

Ticket Issued ● Amber ● Blue ● Green ● Red



Currently only one CBO has been issued by the court and the individual has not been seen in the City since. We are currently processing a further CBO application for continued begging despite all warnings/referrals being given. Awaiting update from the officer in the case – but I have asked for court details to ensure this Sub-committee are aware.

Hub attendance has been mixed, with some days being low, but others being really busy. This is still essential to ensuring a welfare and diversion approach to begging prior to any enforcement activity.

Proactive Op Luscombe days are in place for some days when the hub is operating. This is advantageous as enables those given a ticket for begging the opportunity to obtain immediate support from the hub.

The following dates are in place for Op Luscombe activity.

- 20/11/2024
- 4/12/2024
- 18/12/2024
- 15/1/2025
- 29/1/2025

And every two weeks until April 2025

### **Rough-Sleeping / Tented encampments – Update**

In the last 6 months, Community MARAC Referrals have been made regarding tented encampments at Peninsular house and Castle Baynard Street. This has led to a “Welfare and diversion first” partnership approach between Corporation, Outreach provision and Police.

This in turn has identified a need for a joint policy/approach to tackling the negative impacts of rough-sleeping – ongoing work being led by Simon Cribbens supported by CI Nikki Gander.

The local Ward officers regularly patrol and engage in these areas. There have been joint approaches with police and corporation regarding ASB issues in the area which when conducted in Peninsular House drastically reduced ASB being reported.

An incident at Castle Baynard Street in September (non-fatal stabbing) led to the temporary housing of all rough sleepers at the site due to the crime scene in place. Some later returned, with a key issue being that many have no Recourse to public funding. CoL and CoLP reviewed the risk of leaving empty/abandoned tents in situ and agreed a low-level joint operation to remove abandoned tents and provide a cleanse in the area. This also provided a further opportunity for all those present to engage with outreach services and receive support. Positive feedback from all parties. There has been a slight increase in new tents since. Engagement and policy work ongoing along with regular partnership engagement enabling bespoke response to changing situation.

Due to the ongoing and challenging nature of the issues around rough-sleeping and tented encampments it has been agreed within the CCM to create a specific partnership team, using the SARA model to focus on identifying appropriate solutions, engagements, processes to ensure a balanced, risk assessed approach.

**Snow Hill Assessment Centre Engagement** – Ongoing engagement with management, staff, neighbours and church. Continued joint work to address any issues and identify solutions to any problems.

## City of London Corporation Committee Report

<b>Committee:</b> Homelessness and Rough Sleeping Sub-Committee	<b>Dated:</b> 09/12/2024
<b>Subject:</b> Homelessness and Rough Sleeping Strategy 2023–2027 Update Report	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• <b>Delivers Corporate Plan 2024–2029 outcomes</b></li> </ul>	Links to Corporate Plan outcomes 1,2,3,4,10
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	NA
<b>What is the source of Funding?</b>	NA
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	NA
<b>Report of:</b>	Judith Finlay – Executive Director, Community and Children’s Services
<b>Report author:</b>	Will Norman – Head of Homelessness Prevention and Rough Sleeping

### Summary

This report provides Members with a summary of progress against the aims set out in the Homelessness and Rough Sleeping Strategy 2023–2027. Strategy delivery is administered through a Service Delivery Plan (SDP). The first part of the report offers members a high-level summary of SDP actions underway and completed.

The second part of the report provides Members with a commentary on the Homelessness and Rough Sleeping Strategy 2023–2027 Performance Scorecard and Dashboard (Appendices 1 and 2). A case study has been included at non-public Appendix 3 which help to demonstrate particular achievements, characteristics or challenges faced by the service. Appendix 4 provides Members with a summary of completed actions to date from the Strategy Delivery plan.

The Scorecard and accompanying Dashboard charts are designed to offer Members helpful insights into the successes and challenges encountered through the delivery of the SDP across the lifespan of this strategy.

This report references the following priorities from the Homelessness and Rough Sleeping Strategy 2023–2027:

- Priority 1 – Rapid, effective and tailored interventions
- Priority 2 – Securing access to suitable, affordable accommodation
- Priority 3 – Achieving our goals through better collaboration and partnership
- Priority 4 – Providing support beyond accommodation

## Recommendation

Members are asked to:

- Note the report

## Main Report

### Background

1. This report provides Members with an update on our progress in meeting the objectives set out the Homelessness and Rough Sleeping Strategy 2023–2027. The update forms part of a regular reporting cycle into every Homelessness and Rough Sleeping Sub-Committee.
2. At the June 2024 meeting of the Sub-Committee, Members were introduced to the metrics we will be using throughout the lifespan of the strategy and the formats that will be used to track and present progress.

### Current Position

#### Service Delivery Plan Update

	Priority 1 Rapid, effective and tailored interventions	Priority 2 Securing access to suitable, affordable accommodation	Priority 3 Achieving our goals through better collaboration and partnership	Priority 4 Providing support beyond accommodation	Total
Not started	1	3	3	2	9
Risk	0	0	0	0	0
Underway – issues	1	0	0	0	1
Underway – no issues	7	5	9	3	24
Complete	3	2	5	3	13
<b>Total</b>	<b>12</b>	<b>10</b>	<b>17</b>	<b>8</b>	<b>47</b>



- There are currently 47 actions on the SDP
  - One action is new in the period
  - 38 actions have commenced – four more than the last period
  - 25 actions are currently live (underway with/without issues) – one more than the previous period
  - 13 actions are now completed – three more than the last period
  - No significant risks have been identified at this stage
3. The new action added in the period can be found in Priority 3 – Achieving our goals through better collaboration and partnership. Following discussion at the September Sub-Committee meeting, a new action has been added to develop dedicated public-facing website content that helps to communicate the work we do and our achievements. Work will begin as time allows and is currently scheduled to be completed by the end of Q2 2025/26.
  4. The actions completed in the period are:
    - ✓ A skills and competency audit has been integrated into the review of Pathway services, which begins this quarter (Priority 3)
    - ✓ The nurse-led health in-reach service at Grange Road has been reviewed and findings have been combined with the review of all mobile health delivery models (Priority 4)
    - ✓ A client death protocol has been signed off by the Homelessness and Rough Sleeping Strategy Group and is now in place as a pilot (Priority 4)

#### Performance Scorecard and Dashboard Commentary

5. The Scorecard and presentation slide Dashboard can be found at Appendices 1 and 2 respectively. A case study that helps to demonstrate the achievements of the service can be found at non-public Appendix 3.

#### *Q2 Commentary*

6. The number of combined prevention and relief duty outcomes (1.1) has increased from between one or two over the previous three quarters to four in Q2. This can be accounted for by the number of approaches for assistance increasing from 122 in Q1 to 157 in Q2.
7. The number of rough sleepers recorded in the period (1.2) has decreased by 15% to 256. While this figure is still high, this is the lowest quarterly total since Q2 2023/24. There has also been a small reduction in the number of T1000 clients seen sleeping rough (1.3).
8. The number of rough sleepers occupying high-impact rough sleeping sites (3.2) has increased sharply in the period due to work carried out by commissioned services at Castle Baynard Street.
9. The number of accommodation outcomes (1.4) has increased slightly over the previous period, but is fairly consistent with a natural fluctuation. The number of

accommodation outcomes in the year to date (Q1 and Q2 2024/25) is 90. This is a significant increase over the same period last year (54 in Q1 and Q2 2023/24).

10. The average length of temporary accommodation stays (2.1) has decreased by 33 days in the period. Two private rented sector outcomes were achieved by the Statutory Homelessness Team, one of which was for a client with a stay in temporary accommodation in excess of three years. This contributed to the decrease in average length of stay.
11. Two people accessed private rented sector tenancies in the period (2.3). Both were referred by the Statutory Homelessness Team.
12. The number of referrals received by the Statutory Homelessness Team under the duty to refer (3.1) decreased by three, but this is consistent with a natural fluctuation. The team has received between nine and 12 referrals for the past six quarters.
13. Referrals to specialist substance misuse services (4.1) decreased for the second consecutive quarter – from 35 in Q1 to 25 in Q2. Officers are currently analysing data to measure our understanding of assessed need against the rate of referral to explore the source of the trend. One hypothesis is that the increase in rough sleepers seen only once or twice makes assessment and referral less likely. This will lead to a small proportion of total rough sleepers encountered in the period being referred.
14. The number of individual rough sleepers registered with a GP (4.2) remains at 27% of our total caseload.
15. The number of individuals accessing employment, training or education in the period (4.3) decreased by three to 15. This remains consistent with what we have seen over the last 12 months.

### **Options**

16. There are no options for Members to consider.

### **Proposals**

17. There is no proposal for Members to consider.

### **Key Data**

18. Metrics data can be found in Appendices 1 and 2.

### **Corporate & Strategic Implications**

19. Financial implications – none
20. Resource implications – none
21. Legal implications – none

- 22. Risk implications – none
- 23. Equalities implications – none
- 24. Climate implications – none
- 25. Security implications – none

## **Conclusion**

- 26. One new action has been added to the Strategy Delivery Plan in the period, bringing the total to 47. Work has commenced on four actions, and three actions have been completed during the period. A total of 13 actions are now completed; 25 actions are currently live; and no significant risks have been identified.
- 27. Rough sleeping in the Square Mile has decreased slightly in the period. However, the number of rough sleepers recorded at high-impact rough sleeping sites increased. This is largely due to outreach activity at Castle Baynard Street.
- 28. The rate at which the service is making accommodation placements for rough sleepers is significantly higher at the mid-point in the year than it was at the same point in 2023/24.
- 29. Approaches to the Statutory Homelessness Team increased between Q1 and Q2 which in turn led to an increase in prevention and relief outcomes.

## **Appendices**

- Appendix 1 – Homelessness and Rough Sleeping Strategy Performance Scorecard (table)
- Appendix 2 – Homelessness and Rough Sleeping Strategy Performance Dashboard (charts)
- Non-Public Appendix 3 – Case study
- Appendix 4 – Strategy Delivery Plan Completed Actions

## **Will Norman**

Head of Homelessness Prevention and Rough Sleeping

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## HRS Metrics - Scorecard

	2023/24				2024/25				Change from previous quarter	YTD	Previous Years				
	Quarterly totals				Quarterly totals						2019/20	2020/ 21	2021/22	2022/23	2023/24
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4							
<b>1. Providing rapid, effective and tailored interventions</b>															
1.1. Statutory homelessness is prevented and relieved (Pt7 Housing Act)	7	7	1	2	1	4			3	5	11	8	15	19	17
1.2. Reduction in the number of individuals sleeping (R1)	180	190	279	260	298	256			-42		434	350	372	482	656
1.3. Decrease in City T1000 cohort seen rough sleeping	37	25	18	17	23	21			-2						
1.4. Total number of accommodation outcomes	30	24	78	107	41	49			8	90	185	305	201	245	245
1.5. Annual total of unique individuals seen rough sleeping in Greater London (additional)											10,726	11,018	8,329	10,053	11,913
1.6 (a). Nights under SWEP activation (additional)												42	15	34	18
1.6 (b). Number of individuals accepting SWEP offer (additional)												21	21	50	64
<b>2. Securing access to suitable and affordable accommodation</b>															
2.1. Reduction in the average length of statutory temporary accommodation stays (days)*	132	273	137	488	406	373			-33						
2.2. Increase in the supply of properties available to individuals facing homelessness or are rough sleeping	89	89	89	89	89	89			0	89	58	70	72	74	89
2.2 (b). Increase in the supply of properties available to individuals facing homelessness or are rough sleeping - Total											78	90	117	102	123
2.3. Increase in the number of people accessing private rented sector tenancies	2	4	1	3	0	2			2	2	7	12	8	8	10
<b>3. Working collaboratively</b>															
3.1. Increase in the number of referrals received under S.213b Duty to Refer	9	12	9	10	12	9			-3	21	29	16	19	28	40
3.2. Reduction in the number of individuals rough sleeping in high impact rough sleeping sites (HIRSS)	34	34	57	55	23	42			19						
3.3. Increased satisfaction reported through service user feedback															
<b>4. Support beyond accommodation</b>															
4.1. Individuals with an assessed substance misuse need are referred to a specialist agency	49	54	50	66	35	25			-10	60					219
4.2. Increase in the number of rough sleepers registered with a GP	36%	44%	18%	28%	27%	27%			0	27%					32%
4.3. Increase in the number of service users accessing education, employment or training	15	17	12	14	18	15			-3						
4.4. Reduction in the number of people rough sleeping who had previously moved into settled supported accommodation	6	5	6	4	2				-2	2					

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# HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2027

Department of Community and Children's Services



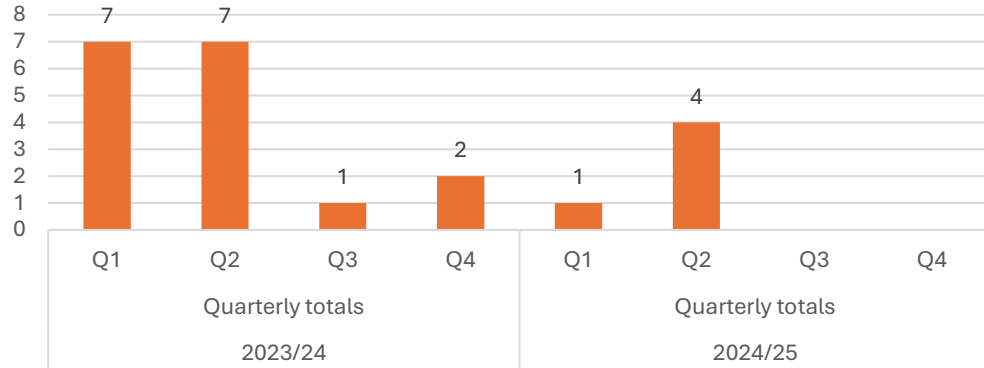
## Performance Metrics

Year 2024/25 – Q2

# Priority Area 1: Providing rapid, effective and tailored interventions

## 1.1 Statutory homelessness is prevented and relieved (Pt7 Housing Act)

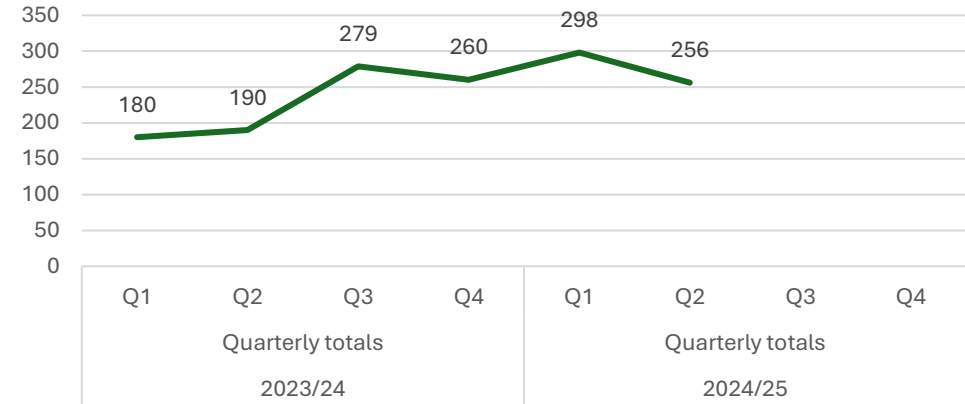
Cases closed in period - Main duty accepted, successful offers of accommodation or S.198 referral to another LA



Source: Jigsaw

## 1.2. Reduction in the number of individuals rough sleeping (R1)

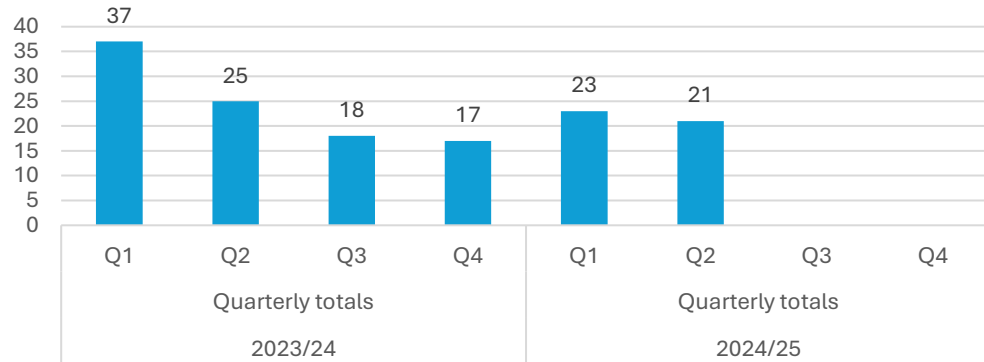
Number of unique individuals per quarter



Source: Chain

## 1.3. Decrease in City T1000 cohort seen rough sleeping

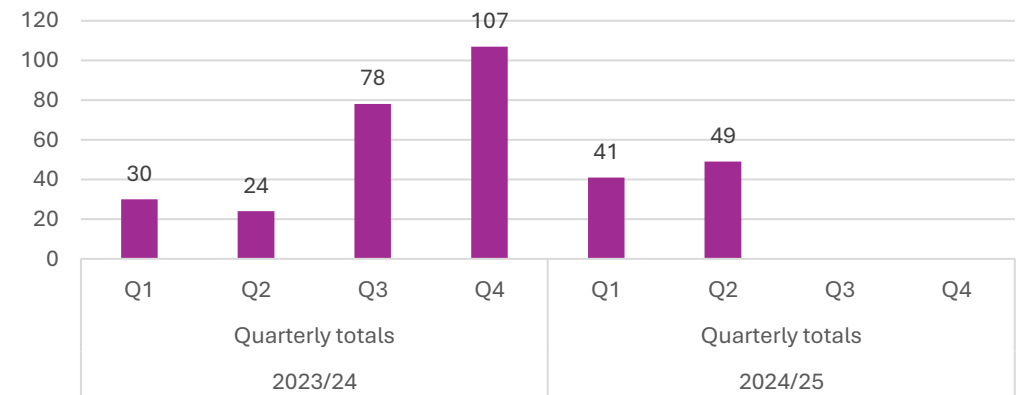
Number of long term and complex needs rough sleepers [T1000]



Source: Chain

## 1.4. Number of people rough sleeping who have moved into accommodation

Number of people rough sleeping who have moved into accommodation



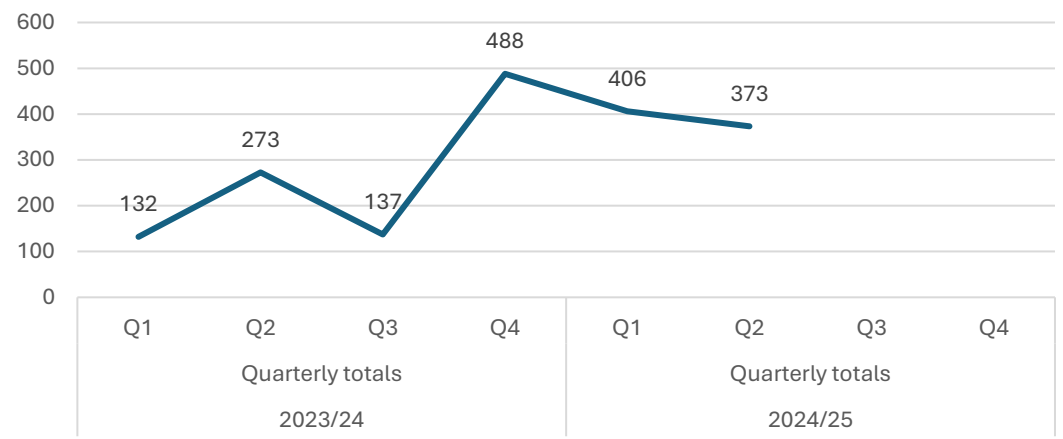
Source: SITRS



# Priority Area 2: Securing access to suitable and affordable accommodation

## 2.1. Reduction in the length of statutory temporary accommodation stays

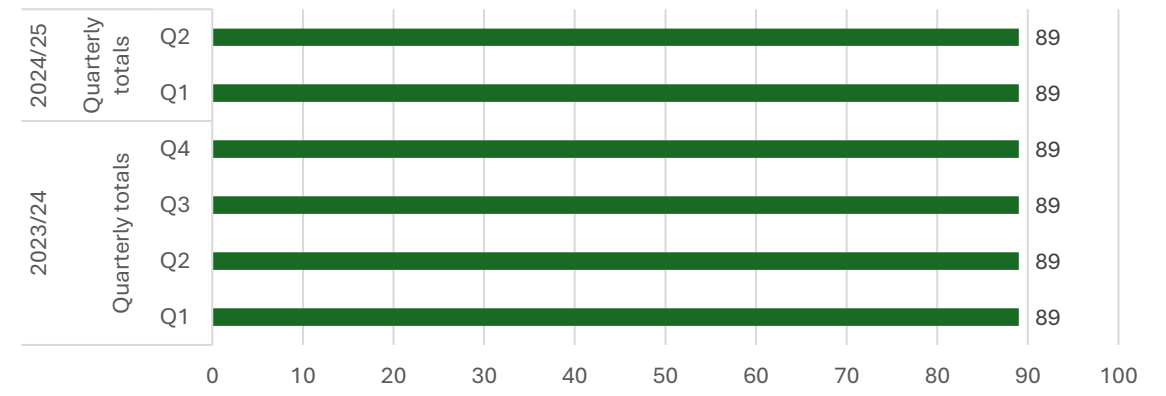
Average length of stay for closed cases in period



Source: Jigsaw

## 2.2. Increase in the supply of properties available to individuals' facing homelessness or are rough sleeping

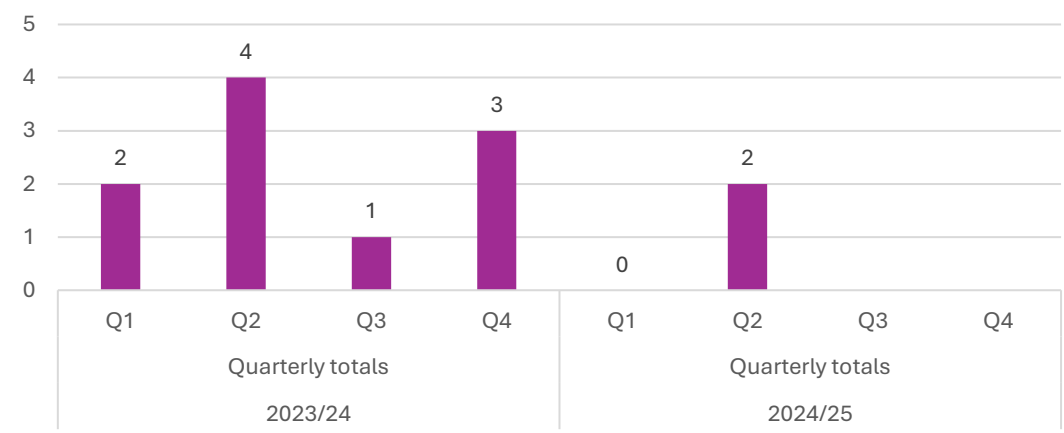
Number of properties available in City of London pathway



Source: RISE

## 2.3. Increase in the number of people accessing private rented sector tenancies

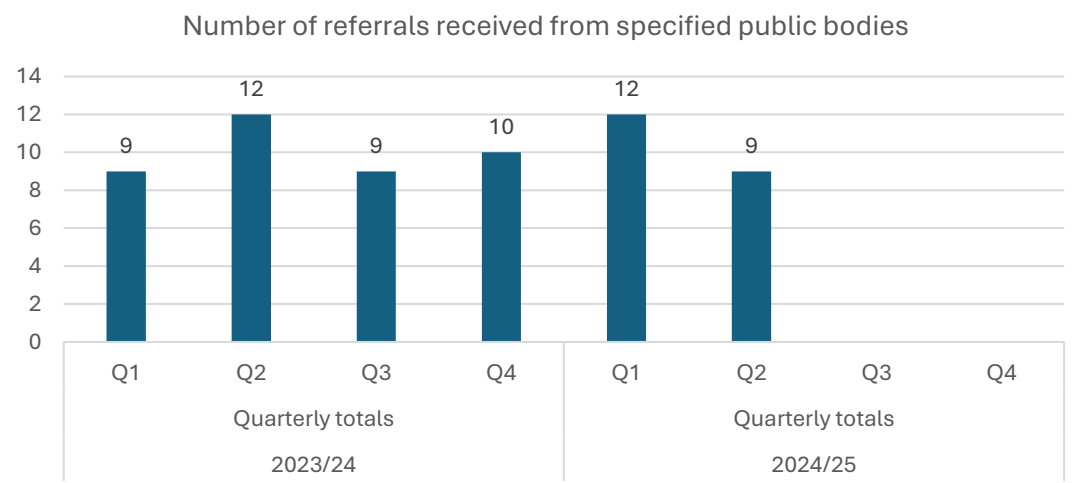
Number of people accessing the private rented sector [statutory homelessness and rough sleepers]



Source: RISE and H-

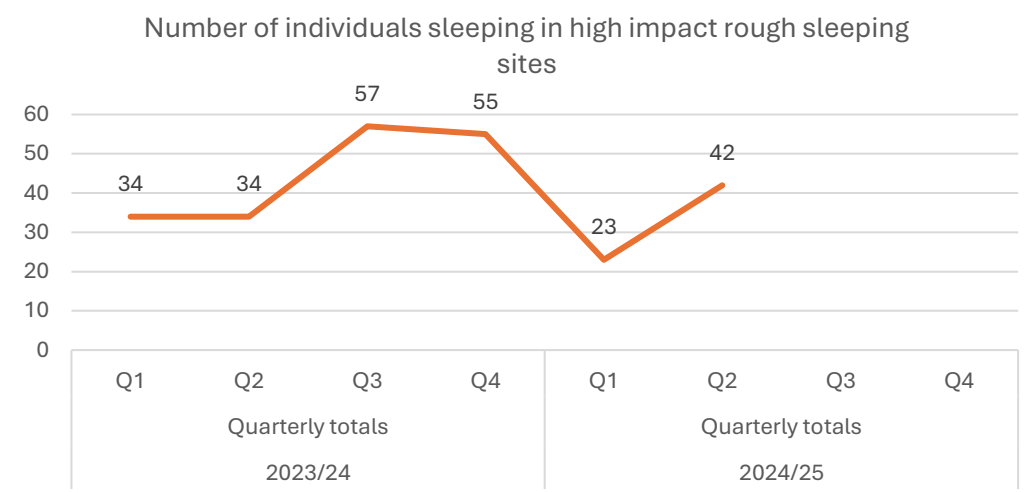
# Priority Area 3: Working collaboratively

## 3.1. Increase in the number of referrals received under S.213b Duty to Refer



Source: Jigsaw

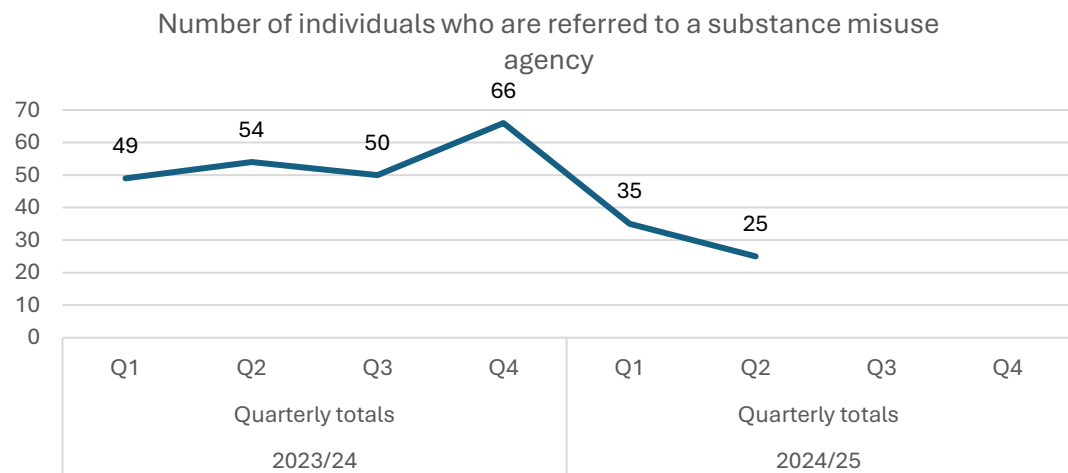
## 3.2. Reduction in the number of individuals rough sleeping in high impact rough sleeping sites (HIRSS)



Source: Chain

# Priority Area 4: Support beyond accommodation

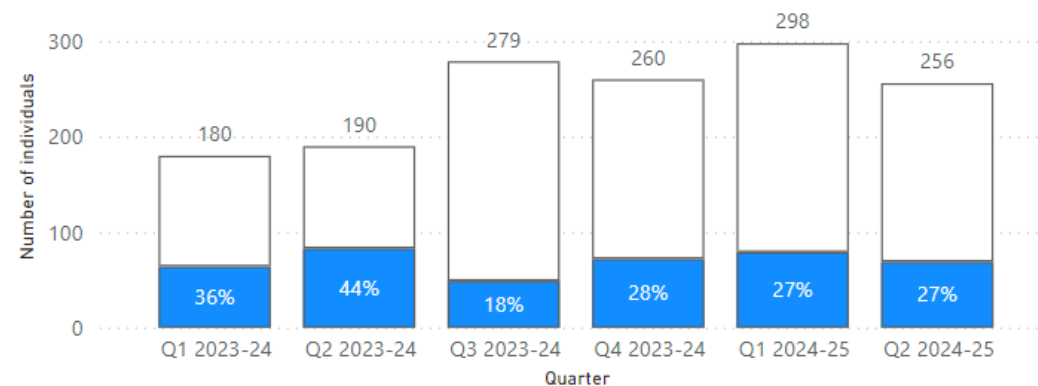
## 4.1. Individuals with an assessed substance misuse need are referred to a specialist agency



Source: CHAIN, Rise

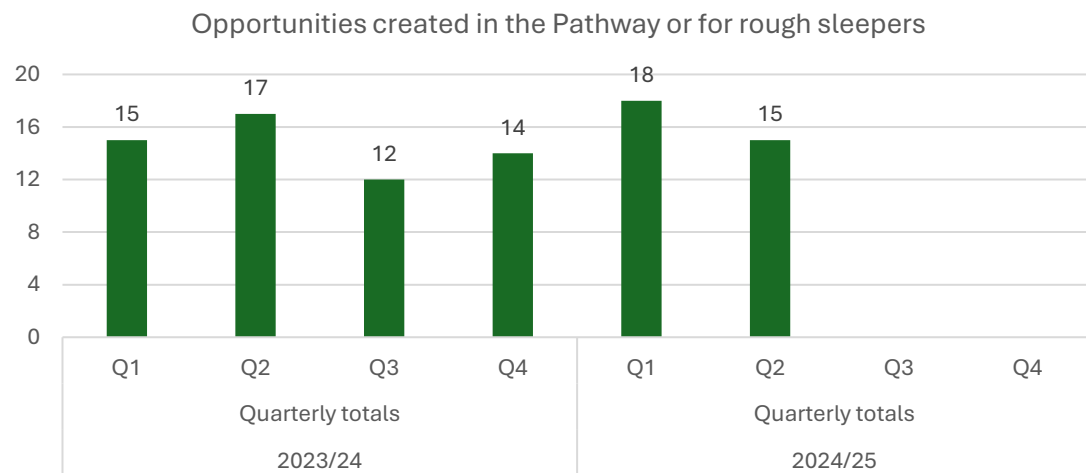
## 4.2. Increase in the number of rough sleepers registered with a GP

Proportion of rough sleepers known to be registered with a GP [as a proportion of 1.2]



Source: Chain

## 4.3. Increase in the number of service users accessing education, employment or training



Source: Local

# HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2027

Department of Community and Children’s Services

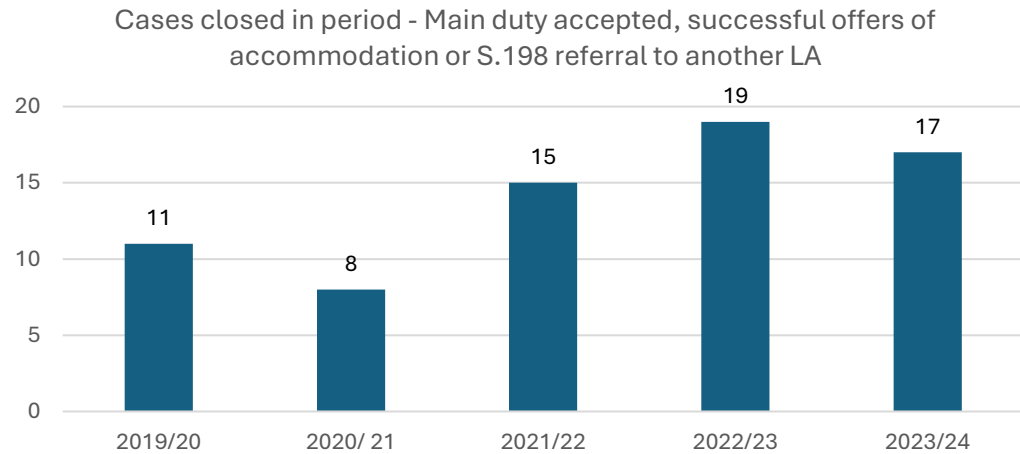


**Annual trend data**

**Year 2019 to 2024**

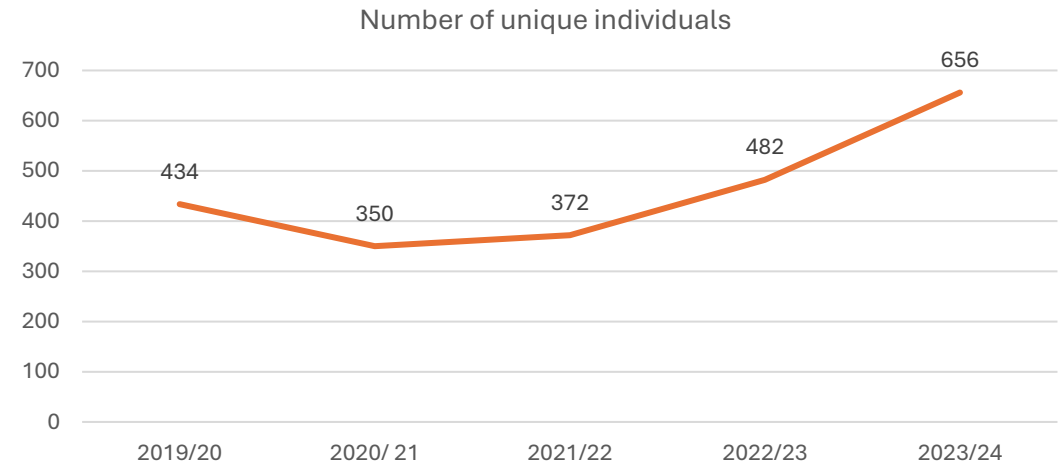
# Priority Area 1: Providing rapid, effective and tailored interventions

## 1.1 Statutory homelessness is prevented and relieved (Pt7 Housing Act)



Source: Jigsaw

## 1.2. Reduction in the number of individuals rough sleeping (R1)



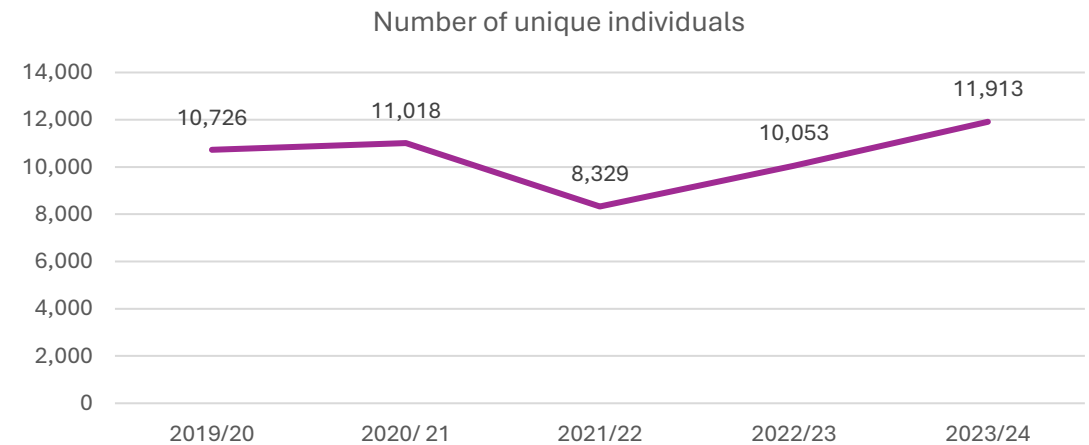
Source: Chain

## 1.4. Number of people rough sleeping who have moved into accommodation



Source: SITRS

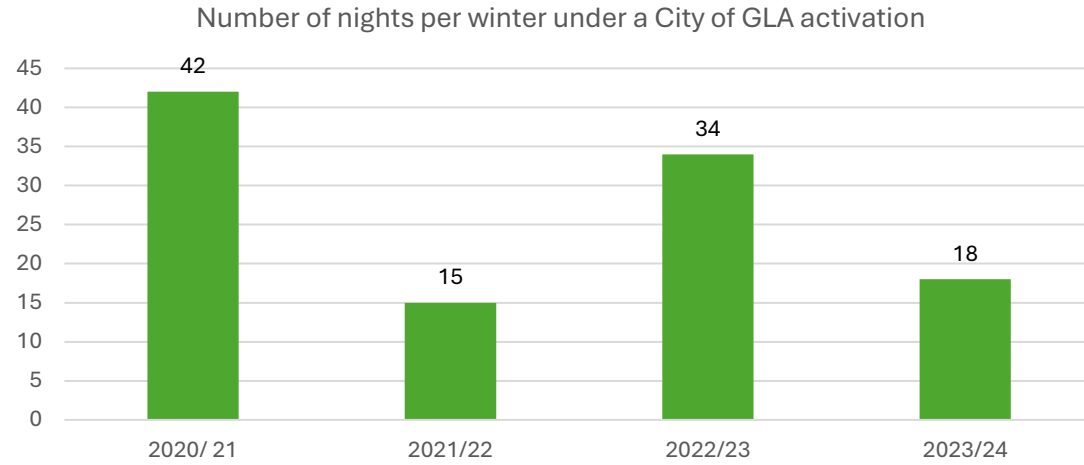
## 1.5. Annual total of unique individuals seen rough sleeping in Greater London (additional)



Source: Chain

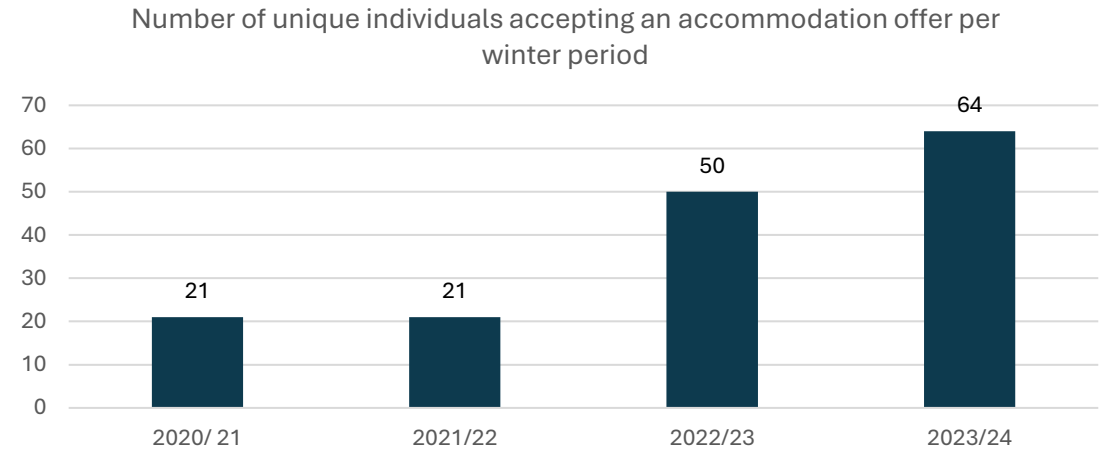
# Priority Area 1: Providing rapid, effective and tailored interventions

## 1.6a. Nights under SWEP activation (additional)



Source: Chain

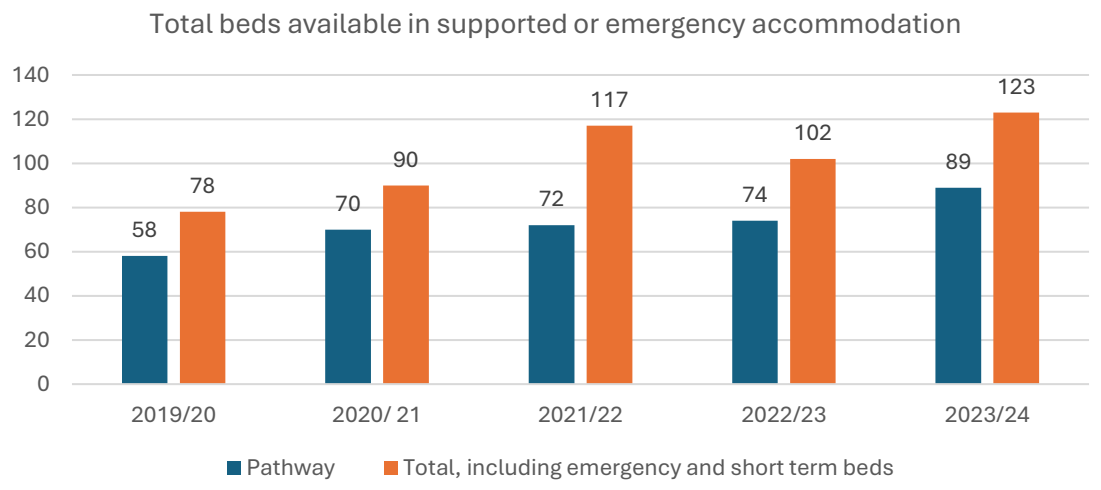
## 1.6b. Number of individuals accepting SWEP offer (additional)



Source: Chain

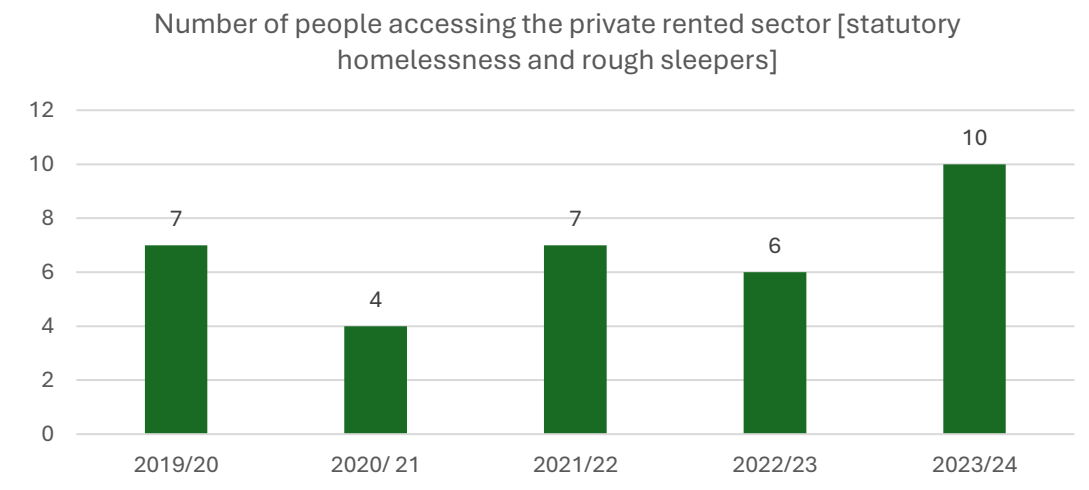
# Priority Area 2: Securing access to suitable and affordable accommodation

## 2.2. Increase in the supply of properties available to individuals' facing homelessness or are rough sleeping



Source: RISE

## 2.3. Increase in the number of people accessing private rented sector tenancies

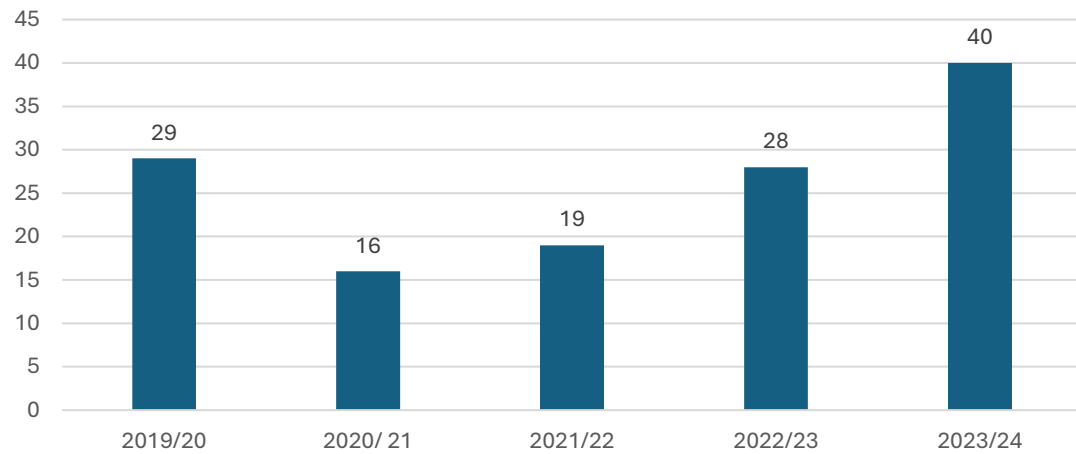


Source: RISE and H-

# Priority Area 3: Working collaboratively

## 3.1. Increase in the number of referrals received under S.213b Duty to Refer

Number of referrals received from specified public bodies



Source: Jigsaw



## Homelessness and Rough Sleeping: Strategy Delivery Plan 2023-27

## Priority 1: Rapid, Effective and Tailored Interventions

Lead Area	Unit	Activity or Intervention	New this RP?	Who?	Does what?	With who?	By when?	Evidence/Audit	Success Measure or Service User Experience	RAG rated progress	Comments on progress
Cross-cutting	1.6	Implement safe access to online information	No	HoS	Review of cookie policy to ensure web based information is safe for DA victims to access	HO	31-Dec-23	Cookie policy	Accessing CoL webpages poses no risk to anyone seeking advice	Complete	DA web content updated and exit button built in to page.
Rough Sleeping	1.10	Mobilise new RSAC	No	HoS	Coordinate partners and internal stakeholders to ensure new service opens by end of January 2024	RSSM, CM, providers	31-Jan-24	Mobilisation plan	Service open according to plan and specification	Complete	Preliminary stages of CSO review underway. FHM to include in handover for KL to pick up in April. Provisional launch pushed back to 13/03 due to delay with PC and lease sign-off. Service opened 13 March 2024. Aug 2024 - KPI's are outstanding, need to be revised, this is underway. Oct 2024 - new KPI's in place.
Cross-cutting	1.11	Develop Rough Sleeping KPI framework	No	HoS	Design set of KPI's which offers long-term trend information to inform evaluation, communications and decision making	RSSM, RSC, SHO, PC	31-Dec-23	KPI framework	More constructive conversation with RSSG, HRS Subcommittee and within service area. Clarity of purpose.	Complete	In draft. Will be incorporated into HRS Strategy metrics approach. July 2024 - now incorporated into HRS metrics and dashboard. Wider discussion needed with officers who chair CMM to align and format KPI's the same for all newly commissioned services from 2025. August 2024 - dashboard redesigned as a scorecard in line with ASC/CSC reporting

## Homelessness and Rough Sleeping: Strategy Delivery Plan 2023-27

## Priority 2: Securing Access to Suitable, Affordable Accommodation

Lead Area	Unit	Activity or Intervention	New this RP?	Who?	Does what?	With who?	By when?	Evidence/Audit	Success Measure or Service User Experience	RAG rated progress	Comments on progress
Cross-cutting	2.9	Implement new TA framework	No	HoS	Roll out procurement framework, direct purchasing vehicle or approved provider list to enable agile procurement	CM, SHO, stakeholders	31-Mar-24	Framework, APL, DPV	Quicker access to safe and suitable accommodation. Compliant procurement.	Complete	Report proposing APL in governance system and under review by legal. Tender documentation being agreed. Expected to go live March 2024. Finalised and in mobilisation phase. First placements expected in August/September. Oct 2024 - all mobilised.
Statutory Homelessness	2.10	Develop TA quality assurance framework and approach	No	HoS	Work with Statutory team to increase skill and competence in existing staff. Implement a QA framework to track quality and safety	SHO, CM, providers, stakeholders	31-Mar-24	QA framework, WFD records	Reduced complaints and premises related incidents in TA	Complete	Working group set up to progress actions. Proving difficult to establish skill set in TSO allocated to role. Consider bringing CoL Environmental Health on board to consult. September 2024 - Systems now in place to track and record inspection outcomes. Demand needs to be tracked to monitor resource implications.

## Homelessness and Rough Sleeping: Strategy Delivery Plan 2023-27

### Priority 3: Achieving our Goals Through Better Collaboration and Partnership

Unit ID	Activity or Intervention	New this RPD?	Who?	Does what?	With who?	By when?	Evidence/Audit	Success Measure or Service User Experience	RAG rate/progress	Comments on progress
3.4	Develop dashboard approach to communicate performance and demand pressures	No	HoS	Bring together LOTI data sets with 'ending rough sleeping' framework indicators to create easily accessible dashboard	RSSM, EW	31-Mar-24	Dashboard	Data informed presentations, reports, commissioning strategies	Complete	Links to KPI framework which is in hand. IG officer has approved SIT DSA and DPIA sign-off from DCCS BST. August 2024 - Scorecard replaces metrics framework.
3.6	Review multi-agency meeting arrangements	No	HoS	Use MAM action plan developed as a response to the Homeless Link review report	RSSM, RSC, stakeholders, providers	31-Mar-24	MAM action pan, ToR's, Sharepoint	Clearer planning and more decisions made through consensus and with user voice	Complete	August - review complete and confirmed with HRRSG
3.7	Establish key skills/competence audit for commissioned providers	No	HoS	Set up system to audit existing skills and competence and schedule annual review mechanism going forward	RSSM, RSC, CM	31-Mar-25	Audit and schedule, MAM action plan	Increased confidence in provider skill level, legal literacy and competence in areas such as ASC, mental health, immigration etc	Complete	Now being landed through Pathway Review and QAF.
3.8	Establish clear procedures with Community Safety Team for hotspots and ASB perpetrators	No	HoS	Implement new MOU and refine approach to cleansing and hotspot action planning	RSSM, RSC, VC	31-Dec-24	MOU, protocols	Individuals are safeguarded and risk is managed. Community interests are represented.	Complete	Draft MOU with CST in place. Referral process into CST IN PLACE. Cleasing protocol needed. On hold pending outcome of new ASB legislation passing through parliament. New action needed once legislation through Parliament.
3.9	Review Sanctuary Scheme	No	HoS	Work with CST and CoLP to review referral process, published materials and payment mechansim	VC, CoLP	31-Mar-24	Sanctuary Scheme materials	Increased homelessness prevention interventions and effective safeguarding actions	Complete	Working group set up and led by Jenna Stanley in CST. New process clarified.

## Homelessness and Rough Sleeping: Strategy Delivery Plan 2023-27

### Priority 3: Achieving our Goals Through Better Collaboration and Partnership

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## City of London Corporation Committee Report

<b>Committee(s):</b> Homelessness and Rough Sleeping – For Information	<b>Dated:</b> 09/12/2024
<b>Subject:</b> City of London Response to the Ministerial Letter on Rough Sleeping	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• <b>delivers Corporate Plan 2024-29 outcomes</b></li> <li>• <b>provides statutory duties</b></li> </ul>	Providing Excellent Services Safeguarding Adults (Care Act 2015)
<b>Does this proposal require extra revenue and/or capital spending?</b>	N/A
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	N/A
<b>Report of:</b>	Judith Finlay
<b>Report author:</b>	Ian Tweedie

### Summary

In May 2024 ministerial letter was sent to Directors of Housing and Adult Social Care, and Safeguarding Adults Board Chairs, outlining recommendations for Safeguarding Adults Boards regarding individuals rough sleeping. The City of London (CoL) have reviewed the recommendations and provided a response to the City and Hackney Safeguarding Adults Board (CHSAB). The response provides assurance that a mature system is already in place to meet recommendations and additional measures being taken to strengthen it further. The independent chair of the CHSAB has expressed satisfaction and agreement with the CoL response.

### Recommendation(s)

Members are asked to: Note the report.

# Main Report

## Background

1. On 20 May 2024, a ministerial letter was sent from the Department for Levelling Up, Housing and Communities jointly with the Department of Health and Social Care, to all Directors of Housing and Directors of Adult Social Services in England, and all Safeguarding Adults Board Chairs.
2. The letter, titled Recommendations for Safeguarding Adults Boards Regarding Individuals Rough Sleeping (Appendix 1), set out a series of recommendations to be considered by the statutory SAB in relation to,
  - Governance structure, accountability, and system-wide change.
  - Named board member for Rough Sleeping
  - Strategic plans, annual reports, and procedures
  - Safeguarding Adult Reviews
3. Following the ministerial letter the independent chair of City and Hackney Safeguarding Adults Board (CHSAB), Dr Ade Cooper, requested individual responses to the recommendations from both the City of London (CoL) and the London Borough of Hackney (LBH) to provide assurance to the board. A proforma was provided to enable consistently formatted responses from CoL, LBH and regionally.

## Current Position

4. The City of London response (Appendix 2), completed by the Assistant Director for People, Chris Pelham, who has responsibility for both Homelessness and Rough Sleeping and Adult Social Care, identifies that CoL has a mature system in place in relations to rough sleeping.
5. The CoL response was presented at the City of London Adults Safeguarding Board Sub-committee on September 3, 2024. As chair, Dr Ade Cooper formally noted that the subcommittee was happy with the CoL response.
6. The CHSAB has since forwarded the CoL response together with that of the LBH to the co-chair of the National Network of Adult Safeguarding Boards (SAB), Professor Michael Preston Shoot, who is collating regional responses.

## Overview of the City of London Response

7. The structure of the People directorate with the Assistant Director for People, being responsible for both ASC and HRS, representing CoL at the CHSAB, demonstrates an existing and long-standing representation of rough sleeping at board level.

8. In addition to the CHSAB there is a separate City of London Adults Safeguarding Board Sub Committee, attended by both the Assistant Director for People and the Head of Adult Social Care. The Head of Homelessness and Rough Sleeping has now been added to the core membership.
9. The CHSAB presents the Annual Report to all the key CoL Committees, including the Safeguarding Sub Committee, the Community and Children Services Committee, the Health and Well Being Board and the Safer City Partnership. Rough sleeping case studies have previously been included CHSAB Annual report and this will now become a standard addition with a section included for the Homelessness and Rough Sleeping Service.
10. The Head of Homelessness and Rough Sleeping is already linked in with the Rough Sleeping Initiative Adviser role and will be able to utilise that established relationship to progress any future developments to support closer working between rough sleeping teams and Safeguarding Adults Boards.
11. The CoL Homelessness and Rough Sleeping Strategy Group have developed a process map to support identification, analysis, and decision making following the death of all rough sleepers in the CoL, including when a referral is triggered for a Safeguarding Adults Review to the CHSAB.
12. There is an existing commitment and pathway for Adult Social Care practitioners to engage in legal literacy training along with mandatory safeguarding training. This is also accessed by the Social Worker in the Homelessness and rough sleeping service.
13. CoL supports the approach to promote wider safeguarding and legal literacy in order to ensure there is professional understanding of how to work with people living on the streets. This will be reviewed by the CHSAB Training Sub Group.
14. CoL is already committed to Adult Social Care colleagues engaging in legal literacy training. We would support this approach in order to ensure there is professional understanding of how to work with people living on the streets within appropriate safeguarding and wellbeing legal and policy contexts. This will be reviewed by the CHSAB Training Sub Group.
15. The CoL Homelessness and Rough Sleeping Strategy Group have developed a process MAP (Appendix 3) to support the identification, analysis, assessment and, if applicable, referral for a SAR to the CHSAB following the death of all rough sleepers in the CoL

## **Options**

N/A

## Proposals

N/A

## Key Data

N/A

## Corporate & Strategic Implications

### Corporate Plan 2024-2029.

This links directly to **Providing Excellent Services**: Supporting people to live healthy, independent lives and achieve their ambitions is dependent on excellent services. Vital to that continued pursuit is enabling access to effective adult and children's social care, outstanding education, lifelong learning, quality housing, and combatting homelessness.

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Financial implications

None

Resource implications

None

Legal implications

Risk implications

Equalities implications –

The report provides a level of assurance around safeguarding work with individuals who rough sleep across all protected characteristics.

Climate implications - none

Security implications - none

## Conclusion

16. The City of London have reviewed the recommendations in the ministerial letter regarding individuals rough sleeping. Assurance has been provided to the City and Hackney Safeguarding Adults Board that the CoL is able, from its perspective, to meet all recommendations, and the independent chair of the board has expressed satisfaction and agreement with the response.

## Appendices

Appendix 1 – Recommendations for Safeguarding Adults Boards Regarding Individuals Rough Sleeping

Appendix 2 – CoL Response to SAB regarding Ministerial Letter

Appendix 3 – Process Map following the death of a Rough Sleeper

**Ian Tweedie**

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Department for Levelling Up,  
Housing & Communities

**Felicity Buchan MP**

*Minister for Housing and Homelessness*

**Department for Levelling Up, Housing and  
Communities**

2 Marsham Street  
London  
SW1P 4DF



Department  
of Health &  
Social Care

**Helen Whately MP**

*Minister for Social Care*

**Department for Health and Social Care**

39 Victoria Street  
London  
SW1H 0EU

20 May 2024

To: All Directors of Housing and Directors of Adult Social Services in England, and all Safeguarding Adults Board Chairs

## **RECOMMENDATIONS FOR SAFEGUARDING ADULTS BOARDS REGARDING INDIVIDUALS ROUGH SLEEPING**

### **Summary of recommendations to Safeguarding Adults Boards (SABs)**

1. **Governance structure, accountability and system-wide change:**
  - a. SABs should ensure their governance structure has the necessary mechanisms to hold partners working with people rough sleeping accountable.
  - b. SABs should act as an active presence in system-wide governance discussions. These discussions should seek outcomes which promote the integration of [experience informed practice](#) into service standards.
2. **Named board member for rough sleeping:** SABs should designate a member of the Board to lead and update on complex or stalled cases within the local authority's Target Priority Group (TPG) of people rough sleeping. DLUHC Rough Sleeping Initiative advisers will soon be reaching out to local authorities to support closer working between rough sleeping teams and Safeguarding Adults Boards.
3. **Strategic plans, annual reports and procedures:** SABs should actively reference rough sleeping and homelessness in annual reports and strategic plans. Promoting workforce safeguarding and legal literacy is also strongly recommended.
4. **Safeguarding Adult Reviews:** In compliance with the [Care Act 2014 \("Section 44"\)](#), SABs should proactively commission Safeguarding Adult Reviews in cases of deaths involving rough sleeping. There should also be a clear focus on implementing learnings from the reviews.

We write to you jointly following our 2022 'Ending Rough Sleeping for Good' strategy with recommendations for how Safeguarding Adults Boards can support individuals rough sleeping. Following this letter, DLUHC will soon be extending a support offer, specifically aimed at areas that face ongoing challenges in resolving long-term and cyclical rough sleeping for adults who are vulnerable and at risk. We want to support local areas to deliver the recommendations and

expectations highlighted in this letter, and in particular, the key role of SABs in protecting individuals sleeping rough from risk of abuse and neglect (including self-neglect).

We know given the high needs of those sleeping rough that there is considerable overlap between rough sleeping and the presence of safeguarding concerns. Most adults rough sleeping are at significant risk of abuse, neglect, and severe escalation of health and care needs.

Research published by [King's College London and the NIHR Policy Research Unit in Health and Social Care Workforce](#) and [Partners in Care and Health](#) shows that many local areas are delivering high standards across a range of practices including assessment of need and risk, provision of social care, and responses to mental and physical health needs. However, the research also points to poor multi-agency working within local authorities (LAs) and the need for good leadership in relation to joint working around individuals experiencing homelessness.

As the primary providers of rough sleeping services, LAs play a pivotal role in addressing the needs of those experiencing homelessness. Through programmes such as DLUHC's flagship Rough Sleeping Initiative (RSI), the Government is bolstering the efforts of LAs in this critical area. In tandem, we recognise that SABs hold a key position in influencing a significant proportion of rough sleeping cases that overlap with safeguarding concerns. **While individual case management and one-to-one support for individuals rough sleeping will always be taken forward by local frontline professionals, SABs are crucial in ensuring that the necessary partnerships, policies, and resources are in place to support this work.**

Whilst most of the recommendations outlined in this letter centre around responsive measures, effective work in this space requires a joined-up local approach blending both formal and supportive safeguarding measures. The proactive and effective use of the duty under the [Care Act 2014 \("Section 42"\)](#) can ensure strong preventative capacity within the area, avoiding fatalities and near misses before they occur.

The following recommendations are aimed at helping SABs support vulnerable individuals rough sleeping. For detail on the Government's definition of rough sleeping, homelessness, and TPG please consult Appendix A.

## 1. Governance structure, accountability and system-wide change

It is important that SABs consider the safeguarding needs of people rough sleeping in their local area – as they would for other groups facing elevated risks. This ensures that local safeguarding arrangements and partnerships adequately protect adults with care and support needs who may be vulnerable to abuse or neglect (including self-neglect).

It is important that the governance structure of SABs incorporates clear and sufficient accountability mechanisms for partners with responsibilities towards people rough sleeping.

SABs should take an active role in promoting outcome driven discussions around governance. This should centre on system-wide change and the integration of [experience informed practice](#) relating to safeguarding people rough sleeping. Whilst recognising the collective challenges faced by SABs, there needs to be consensus on a unified vision, along with clear delineation of roles and responsibilities to ensure the quality of policies, procedures, and practices for people rough sleeping.

## 2. Named board member for rough sleeping

In line with the recommendations of the [National Institute for Health and Care Excellence 214 Guidelines](#) on homelessness, and as outlined in our strategy, we expect each SAB to designate a named member on the board to lead on safeguarding the welfare of people rough sleeping,

including engagement and face-to-face practical safeguarding support. The appointed advocate should have a thorough understanding of local safeguarding arrangements for people rough sleeping to ensure adequate protection. This could be the Director of Housing or a co-opted member from the faith, voluntary, and community sector. We stress the importance of selecting an advocate tailored to each locality.

While the Board may not engage in case-by-case discussions, **the appointed advocate should provide regular updates on the long term and stalled TPG (see appendix A for definition) cases which have been referred to SABs and where resolution of need may provide the greatest challenge.**

**DLUHC RSI advisers will be reaching out to local authorities to support closer working between rough sleeping teams and SABs to help drive resolutions for a small number of the TPG cases where individuals are furthest away from ending their rough sleeping.** Our aim in this engagement is to understand existing barriers in this way of working, identify challenges, and promote best practices.

The emphasis is on joint working across sector specialisms for stalled and stuck cases and where housing and social care needs are inextricably linked. One example of best practice in regard to a multi-agency response is Barnsley Council in South Yorkshire. Barnsley's Housing and Adult Social Care Teams co-chair a case management forum that brings together services where a multi-agency response is required to risk mitigation and problem-solving. The focus is on collaboration and flexible responses to assessments, housing, and access to specialist accommodation with support for people who are rough sleeping and/or a part of the TPG. For more helpful insight around LAs engaging with TPG and things to consider, please refer to the illustrative case in Appendix B.

### 3. Strategic plans, annual reports and procedures

SABs should aim to make specific reference to rough sleeping and homelessness in their strategic plans and reports. They should also establish procedures for practitioner engagement with this cohort through promoting workforce literacy around understanding safeguarding, relevant legislation, perceived stigma, multiple disadvantage, and the roles and responsibilities of various stakeholders in supporting individuals rough sleeping.

### 4. Safeguarding Adult Reviews

We encourage SABs to commission safeguarding reviews for incidents involving rough sleeping deaths. While not all cases may involve care and support needs, many Safeguarding Adult Reviews feature homelessness as a factor. It is important to exercise [Care Act 2014 \("Section 44.4"\)](#) review rights for cases that do not meet the threshold to ensure relevant lessons learned are derived from incidents involving rough sleeping. There are many examples of good practice already, including [Haringey Safeguarding Adults Board's SARs process](#).

Thank you for your dedication to ending rough sleeping and contributing to the wellbeing and safety of vulnerable individuals rough sleeping.



**Felicity Buchan MP**  
Minister for Housing and Homelessness



**Helen Whately MP**  
Minister for Social Care

## Appendix A - Defining homelessness and rough sleeping

**Homelessness:** legally, a person is considered homeless if they do not have accommodation that they have a legal right to occupy, which is accessible and physically available to them (and their household) or which it would be reasonable for them to continue to live in. Rough sleeping is one form of homelessness.

**Rough Sleeping:** the most acute and extreme form of homelessness that is characterised by someone about to, or actually, bedding down in the open air (such as on the street, in tents, doorways, parks, bus shelters or encampments) or places not designed for habitation (including cardboard boxes, stairwells, cars and other makeshift and not fit for purpose places). Rough sleeping does not include instances of those in hostels, shelters, recreational shelters such as campsites or spaces of protest, squatters, and travellers.

**Target Priority Group:** people that experience long-term and cyclical rough sleeping – known to LAs as the Target Priority Group or Target Thousand in London.

## Appendix B - Steve Case Study – Target Priority Group

Steve, a white British male in his 40s, has been sleeping rough for several years and has a long history of placement breakdown and tenancy failure. He has significant physical and mental health concerns often resulting in episodes of self-neglect which are compounded by a chronic substance use disorder linked to alcohol. He is well known to agencies in AnyTown and has been identified by the local authority as part of the Target Priority Group (TPG).

Due to high levels of intoxication, Steve came into repeat contact with blue light services often resulting in hospital admissions. Steve can be challenging to work with, often becoming verbally abusive and mistrusting of professionals.

Even within a hostel setting staff reported that he could not safely access facilities to meet his personal care or nutritional needs. They raised concerns that Steve was often tearful and withdrawn and he eventually abandoned the accommodation stating, “they can’t do anything for me here”.

For Steve, his housing, health and social care needs were interdependent. His alcohol use raised additional areas of risk and capacity that needed careful exploration. Many practitioners felt he was making “unwise decisions” and that this limited their ability to offer support. Numerous safeguarding alerts have been raised but responses have not always been consistent.

There are varying degrees of concern regarding Steve’s ability to keep himself safe and how his needs are understood, with views diverging across sector specialisms resulting in a high degree of uncertainty across multi-disciplinary teams. In addition, it has not always been clear which assessments have been done by whom and with what outcome.

### Prompts and considerations:

This case study highlights issues that could be considered in this and other cases to improve how Steve and people like him are supported.

- What are Steve's views and how are these expressed? And does Steve understand why agencies are concerned for his wellbeing?
- How should partner agencies work together? And who is best place to lead and coordinate the case of Steve?
- Should a safeguarding enquiry be triggered under section 42 Care Act 2014? And/or a care assessment? Are assessments occurring flexibly and at a time and place to best engage with Steve, and who is best placed to do them?
- What legal powers can be considered to facilitate positive multi-disciplinary practice and interventions, including addressing immediate risk factors whilst considering medium to long term planning?
- Is a mental capacity assessment warranted? if so, what are the decisions that are required to be made by Steve and at what point?
- How are you using Safeguarding Adult Reviews to inform ways of working with Steve?
- Is there sufficient expertise and legal acumen available, including access to these, to inform assessments and case coordination that enable positive practice?
  - In the case of Steve, or similar cases, how should challenges and issues be escalated and to what role(s) and department?
  - If there are gaps in service provision, including specialist accommodation, that are required to best meet Steve’s assessed eligible needs, how should this be raised and to whom? And how could Steve’s needs be met in the interim?

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City and Hackney Safeguarding Adults Boards Response to Ministerial letter of May 2024 to Directors of Adult Social Care, Housing & SAB  
Chairs with recommendations for SABs on - Individual Rough Sleeping

	<b>Recommendation</b>	<b>Safeguarding Adults Boards Evidence/Action</b>
1.	<b>Governance structure, accountability, and system-wide change.</b>	
1A.	SABs should ensure their governance structure has the necessary mechanisms to hold partners working with people rough sleeping accountable.	<p>The CHSAB is well established with engagement and attendance from all statutory partners. At the current time, the City of London is represented on the CHSAB by the AD People. The AD People is responsible for CoL Adult Social Care and CoL Homelessness and Rough Sleeping and is therefore, well placed to address the new requirements set out within this letter.</p> <p>There is also a City of London Adults Safeguarding Board Sub Committee which addresses specific issues for the CoL Safeguarding Partnership. As well as the AD People sitting on this sub-Committee, Head of Adult Social Care also attends and as part of future planning the Head of Homelessness and Rough Sleeping will be part of the membership.</p>
1B.	SABs should act as an active presence in system-wide governance discussions. These discussions should seek outcomes which promote the integration of experience informed practice into service standards.	The CHSAB presents the Annual Report to all the key CoL Committees, including the Safeguarding Sub Committee, the Community and Children Services Committee, the Health and Well Being Board and the Safer City Partnership.
2.	<b>Named Board Member for rough sleeping</b>	
	<p>SABs should designate a member of the Board to lead and update on complex or stalled cases within the local authority's Target Priority Group (TPG) of people rough sleeping.</p> <p>DLUHC Rough Sleeping Initiative advisers will soon be reaching out to local authorities to support closer working between rough sleeping teams and Safeguarding Adults Boards.</p>	<p>As noted above, the AD People will meet this requirement at the main CHSAB on behalf of the CoL. At the CoL Adults Safeguarding Sub Committee, the Head of Homelessness and Rough Sleeping will fulfil this requirement.</p> <p>The Head of Homelessness and Rough Sleeping is already linked in with the RSI Adviser role and will be able to utilise that established relationship to progress any development work, if required.</p>
3.	<b>Strategic plans, annual reports and procedures</b>	Case studies have been cited in the past. This will become a standard addition

		to the CHSAB Annual report with a section included by the Homelessness and Rough Sleeping Service.
	SABs should actively reference rough sleeping and homelessness in annual reports and strategic plans.	

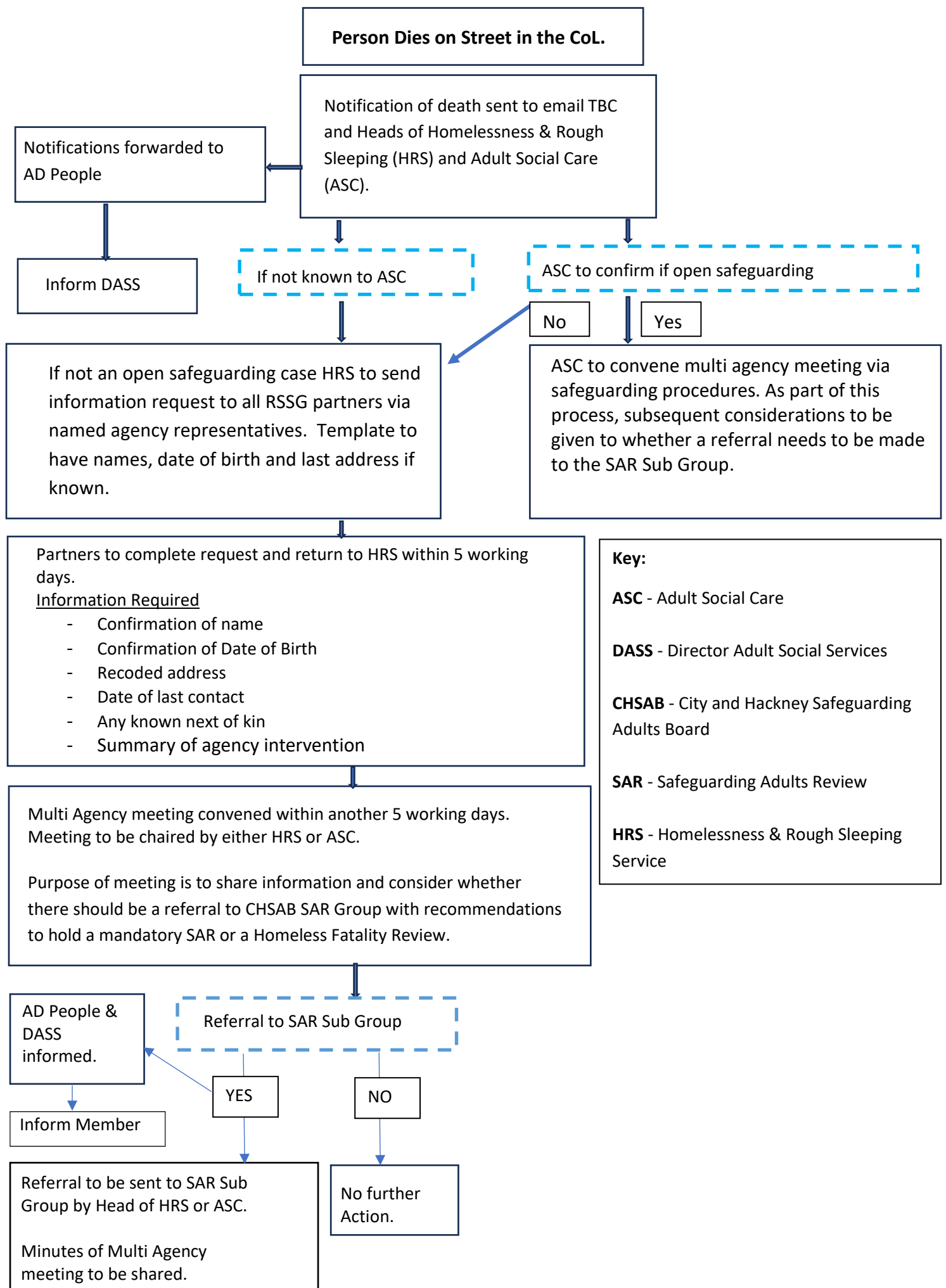
City and Hackney Safeguarding Adults Boards - Individual Rough Sleeping

	Promoting workforce safeguarding and legal literacy is also strongly recommended.	This will be reviewed by the CHSAB Training Sub Group. CoL is already committed to Adult Social Care colleagues engaging in legal literacy training. We would support this approach in order to ensure there is professional understanding of how to work with people living on the streets within appropriate safeguarding and wellbeing legal and policy contexts.
4.	<b>Safeguarding Adult Reviews</b>	
	In compliance with the Care Act 2014 ("Section 44"), SABs should proactively commission Safeguarding Adult Reviews in cases of deaths involving rough sleeping. There should also be a clear focus on implementing learnings from the reviews.	The CoL Homelessness and Rough Sleeping Strategy Group are developing a process MAP to support the identification, analysis/assessment and, if applicable, referral for a SAR to the CHSAB following the death of all rough sleepers in the CoL.





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<b>Committee:</b> Homelessness and Rough Sleeping Subcommittee	<b>9 December 2024</b>
<b>Subject:</b> Tackling the detrimental impacts of rough sleeping – draft proposals	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>Yes – if implemented</b>
<b>If so, how much?</b>	<b>To be determined</b>
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>No – funding will need to be identified</b>
<b>Report of:</b> Judith Finlay, Executive Director of Community and Children’s Services	<b>For Discussion</b>
<b>Report authors:</b> Simon Cribbens, Community and Children’s Services Nikki Gander, Chief Inspector, City of London Police	

## Summary

This report presents a draft policy statement and protocol in support of interventions to tackle the detrimental impacts of rough sleeping. It notes the harms to individuals from long term rough sleeping, and the negative impact on communities from behaviours that can be associated with rough sleeping.

The report poses some key questions and points of consideration (paragraph 37) for Members, in order to finalise a proposal for approval at the Grand Committee.

## Recommendation

Members are asked to:

- Consider and comment upon the draft policy, protocol
- Note risk and resource implications

## Main Report

### Background

1. The City of London Corporation is committed to supporting those who sleep rough on the Square Mile have a route off the streets tailored to their needs and circumstances. The Corporation invests in specialist outreach services, hostel accommodation (including provision for those with complex needs), a dedicated social worker, health and substance misuse services and a recently opened assessment centre providing emergency beds and a place of safe assessment away from the streets.

2. Services are delivered in the context of increased pressures - with the level of rough sleeping increasing significantly across the capital. Many of those who sleep rough in the City are entrenched and have complex needs. Such individuals often refuse offers of support, accommodation and other welfare intervention. Others are without recourse to public funds, and therefore the service offered to them is very limited, and often unattractive to individuals concerned.
3. Almost all those who sleep rough in the Square Mile have slept rough elsewhere previously – either another London local authority or elsewhere in the UK.
4. For those who are street homeless, rough sleeping presents considerable risks to health and wellbeing. Research by the homeless charity Crisis reports that people sleeping on the street are almost 17 times more likely to have been victims of violence in the past year compared to the general public.<sup>1</sup>
5. NHS England has reported that people experiencing homelessness and rough sleeping have a reduced life expectancy (44 years for men vs. national average of 79.4 and 42 years for women vs. national average of 83.1).<sup>2</sup>
6. Rough sleeping can also be associated with activities like begging, street drinking, substance misuse and other antisocial behaviour. For those who live, work or learn in the City, these behaviours can be intimidating or have detrimental impact, and where they persist, they may undermine confidence in the City Corporation’s support services and the City of London Police.
7. Not all those who sleep rough engage in begging, anti-social or criminal activities. However, anti-social behaviour has been associated with the presence of tent encampments and rough sleeping “hotspots” in the City. This has included dangerous substance misuse practices, verbal abuse of Corporation officers and contractors, and defecation and urination in public spaces. The City Police has also responded to increased criminal activity related to rough sleeping encampments.
8. The use of barbecues or fires for cooking – sometimes experienced - is dangerous. Encampments can also have wider detrimental impacts on the community, including deterring use of or blocking access to the highway or other public and privately owned spaces.
9. Homelessness support services also express concern that rough sleeping in tents can increase the risk of financial and sexual exploitation, and domestic abuse of some homeless people.
10. Two such encampments are present in the Square Mile – one at Peninsular House close to the Monument, the other at Baynard House. Both have elicited concerns from Members, City businesses and City Corporation Officers, and requests for action to be taken.

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<sup>1</sup> [New research reveals the scale of violence against rough sleepers | Crisis | Together we will end homelessness](#)

<sup>2</sup> [PowerPoint Presentation \(england.nhs.uk\)](#)

## Current Position

11. The City Corporation and City Police have co-ordinated action with wider partner services to reduce the impact of anti-social behaviour associated with individuals within the encampments at Peninsular House and Castle Baynard Street. While this has had a positive impact (including resulting in the take up of accommodation offers previously refused) several tents remain in these locations, with the continued risk to the wellbeing and safety of those who remain, and risk of negative impact on the local community.
12. The presence of tents and rough sleeping at Peninsular House has persisted for six years. During that period, the number of people sleeping rough fluctuates – reaching 12-15 people at times. In April 2024 16 tents were present. Where numbers of tents or individuals sleeping rough have reduced, it is common for people to return, or for those new to rough sleeping in the City to occupy tents that remain.
13. At Baynard House in the west of the Square Mile - twenty tents have been reported in this location. A recent violent incident established a crime scene preventing occupancy of some tents. Support offers to provide route off the streets to those occupying these tents had not previously been accepted. This group is mostly without recourse to public funds, and therefore the support offer focuses on regularisation of immigration status or supported return to country of origin. In the circumstances of the recent crime, the City Corporation has been able to use discretionary powers to provide temporary accommodation to nine individuals. This enabled recent action to remove unoccupied tents and clean the area.
14. Interventions to respond to encampments in the City have been reactive in relation to escalating issues and risk. They have not been planned as part of a wider and longer term approach. This is because the City Corporation does not have a clear policy position to guide and empower officers. Neither is there the necessary resource required for more co-ordinated and sustained interventions were that approach to be pursued.
15. It is notable that some other authorities – where there is much greater issue and incidence - have developed and resourced clear and agreed approaches in the form of policy, protocols or guidance. These ensure clarity and transparency about the approach to interventions, and a clear authorisation process which drives consistency with that approach. They ensure issues of welfare support, risk and proportionality have been fully considered and evidenced.
16. A range of powers exist that can be used to intervene with and tackle anti-social behaviour – including that associated with the behaviour of some who sleep rough.
17. It should be noted that the limited use of enforcement powers to date - such as Community Protection Notices - and any future use, is never solely because someone is sleeping rough or homeless.

18. A summary of the key powers is given in Appendix 1. They include powers that attach to an individual (such as those contained in the Anti-social Behaviour, Crime and Policing Act 2014), a location or address (Highways Act) or trespass. Some spaces are additionally protected by local bylaws.
19. Any enforcement action requires careful planning in terms of ensuring that capacity/wellbeing assessments take place before any action is taken and equalities and human rights assessments are completed. Action requires the involvement of a range of partners including homeless outreach services, social services, health services, cleansing services and the City Police.

### **Options**

20. The use of legal powers is rightly challenging, and open to legal challenge. It is imperative that such powers are used carefully and proportionately and are underpinned by robust evidence of both support to an individual, and the impact of behaviours. Their use must align with all with the legal obligations of specific powers and be underpinned by assessments of Equalities Impact and (for some powers) a Human Rights Act assessment.
21. Interventions are Operationally complex and require a range of activity by many services and partners in advance and at the time. Consideration must be given to many humanitarian and practical issues.
22. Although clusters of rough sleepers, such as those in tent encampments, can pose significant risks to the homeless and can adversely affect communities, the City Corporation and associated services might consider a passive approach in which only welfare support is offered. However, such an approach could enable tented encampments to persist, leading to environments that are unsafe for those who are street homeless, in which associated anti-social behaviour occurs, and which cause distress to communities. The focus of the City Corporation's response to rough sleeping has always been underpinned by the urgent need to prevent entrenchment and bring individuals into services that can provide support.
23. An approach based on tackling anti-social behaviour or using powers to address obstructions or trespass will necessarily have to be tailored and proportionate. There may be circumstances where the use of such powers would not be proportionate, and therefore interventions would be very limited and fall short of the expectations or requests of some stakeholders.
24. If an approach were taken to clear a site, consideration will need to be given as to how this will be sustained through follow up action or design changes.
25. It is proposed that an agreed policy, and protocol for its use, would provide for planned and proactive approaches to tackle the detrimental impacts of rough sleeping. This would not be an approach in isolation. Any intervention to address the negative impacts that can occur, would sit alongside a wider welfare offer including health, advice and accommodation offers.



26. Such a policy would reflect the balance of responsibilities the City Corporation and the City of London Police have to all sectors of the community.
27. The protocol would allow confident authorisation, ensuring demonstration that actions are a justified, reasonable and proportionate response to the detrimental effect of the activities.

## **Proposals**

28. A policy statement will set out the range of actions the City Corporation may take where there is anti-social behaviour associated with rough sleeping. It will provide the rationale for doing so, and the reassurance of the welfare and support targeted at those street homeless.
29. The policy will include the removal of abandoned property, including tents, and the circumstances in which they will be stored for a period in which the belongings can be reclaimed.
30. The proposed policy statement is found in Appendix 2. If approved, Members should consider whether this statement be made publicly available on the City Corporation website.
31. It will be accompanied by a protocol. This will be an operational tool but will set out the clear requirements of evidence – both of negative impact and support to those affected – that would inform decision making.
32. The protocol is designed to ensure that activity aligns with the values of the City Corporation's Homelessness and Rough Sleeping Strategy regarding the delivery of compassionate and humanitarian support in order to address the complex challenges linked to homelessness.
33. It recognises that there will be instances where partnership intervention may be required in order to address specific concerns and issues linked to rough sleeping associated crime and anti-social behaviour. Such interventions would be progressed where Initial interventions have failed to address the behaviour and reduce the harm being caused, and the behaviour is continuing or escalating. It must be evidenced that:
  - the behaviour is impacting numerous people and businesses;
  - the behaviour is impacting upon an agency's resources and day to day operations; and
  - the behaviour is impacting vulnerable people who continue to be significantly impacted.
34. The protocol outlines the authorisation process to be used by the City Corporation. It will provide for consistency regarding the decision-making process and to ensure an increased level of communication with the senior officers and relevant elected members.
35. The proposed protocol is found in Appendix 3.

36. The approval of both policy position and protocol will enable officers to act with confidence of political support, while providing Members with reassurance.

### **Key questions and points of consideration**

37. The policy and the protocol shared remain draft. In order to progress and/or amend, Members are asked to consider the following key questions and points:

- Is planned intervention supported in principle?
- If not, how should the current (status quo) approach be represented and communicated?
- If intervention is supported, what is the threshold at which members would support intervention? Criminality only? ASB? Community impact?
- Are Members willing to progress accepting the risks (set out below)?
- What safeguards or reassurances are needed? How might this be resourced?
- What further information may be necessary to inform a decision?
- Those without recourse to public funds have limited offers. Are Members content to progress in that context?
- Even with an agreed policy any action will be constrained until sufficient resourcing can be identified.
- If agreed should a policy statement be published on the City Corporation's website?

### **Risk and Issues**

#### *Limitation of offer to those with "no recourse to public funds" (NRPF)*

38. The current profile of those engaged sleeping rough in tented encampments suggests the majority are NRPF.

39. Despite the Government's intent to end rough sleeping, the law with regards to immigration status has not changed and no recourse to public funds conditions continue to apply.

40. These conditions limit the actions that local authorities can take – especially in the provision of accommodation. Where individuals have care and support needs that meet the eligibility criteria for support under the Care Act, accommodation can be provided. Other duties and powers provide some very limited circumstances in which accommodation can be provided. Where accommodation can be provided, there is risk of a significant financial burden to the authority

41. Section 21 of the Care Act clarifies that local authorities are not required to provide care and support to a person who is subject to immigration control solely for the purpose of alleviating destitution when that person has no additional care and support needs.
42. Often, individuals who have NRPF will be aware of their status, and are reluctant to engage with outreach teams, or support offers that may be limited to advice or supported return to a home country.
43. The City Corporation's services will always provide advice and signpost to charitable organisations that offer services, and sometimes accommodation, to those who are without recourse.

### *Displacement*

44. Interventions in response to anti-social behaviour can disrupt an area of concentrated rough sleeping. Such interventions can usefully encourage the take up of services and support previously refused. It can echo outreach practice, which does not seek to enable or support life on the streets, but challenges it assertively because of the significant risk street homelessness poses to individuals.
45. However, there is a risk that intervention may serve only to displace people sleeping rough from one area to another. These individuals may risk losing belongings or lose access to an area they perceive as good or safe for rough sleeping.
46. Such displacement could be across local authority boundaries which may create additional demands and challenges to the services in those areas.
47. This risk cannot be fully mitigated. Therefore, any planned intervention must weigh the impact of harms that are being addressed (or potentially not), against the risk the issue may be displaced.

### *Return*

48. Interventions may serve to reduce rough sleeping encampments or hotspots. However, their impact may be short term with homeless people returning to an area, or others replacing those who have left. Since the operation to remove abandoned tents at Castle Baynard Street, four new tents have been erected in the area.
49. Some powers – such as a Public Space Protection Order (PSPO) – attach to a space rather than an individual. A PSPO can have effect for up to three years, and therefore may provide a longer-term intervention if enforced. A PSPO could be directed at the determinantal effects often associated with encampments and hotspots – such as drugs paraphernalia, public urination/defecation and littering. The use of such powers must demonstrate the actual or likely detrimental effect and that it is, or is likely to be, persistent in nature.

50. Closure of areas, and design interventions, can deter hotspots and encampments from establishing or being returned to. Such changes can be difficult to secure and may have cost and other implications.

#### *Legal Challenge and criminalisation*

51. The use of powers and tools available to local authorities and the police is rightly open to legal challenge.

52. The establishment of a clear policy and protocol seeks to mitigate the risk of the disproportionate or inappropriate use of powers. Supporting processes will ensure that the necessary assessments – such as an Equality Impact Assessment or Human Rights Act Assessment – are in place, and the evidential base supporting intervention is robust and adequate.

53. Enforcement of powers such as Community Protection Notices or Public Space Protection Orders can escalate to criminal sanction. It is not the aim of this policy to criminalise rough sleeping.

54. It has been the experience of the City Corporation and City Police, that the use of powers such as a Community Protection Notice or Warning does have a deterrent effect. The possibility that failure to comply to with the terms of a power may lead to criminal action must be weighed against the impact on the wider community of anti-social behaviours.

#### *Reputational risk*

55. Action to tackle issues such as anti-social behaviour associated with rough sleeping encampments has - in many local authorities - attracted negative news and social media coverage. A communications strategy should be considered and sit alongside the action being taken.

56. However justified, there is a risk that it is portrayed as disproportionate and motivated by a desire to remove rough sleepers.

57. The policy and protocol set out to mitigate this risk by making clear the rationale for an intervention and the requirement for evidence of the support offer provided to individuals, and of the impact their behaviour or actions have.

58. Reputational risk and impact are likely to be short term.

#### **Equalities considerations**

59. An Equalities Impact Assessment is being developed. Equalities data for the whole City rough sleeping population demonstrates limited over-representation of protected characteristics. The most significant over-representation is in terms of male sex with males accounting for 90% of those recorded on the streets. Negative impacts are mitigated through a welfare led approach to ensure needs are properly assessed and support offers are available.

60. Further detail is being sought in relation to the characteristics of those in tented encampment to see if they diverge from the wider rough sleeping population.

## **Resourcing**

61. The planning and delivery of interventions has a range of resource implications.

62. The primary need is for capacity to co-ordinate and plan activity. This would include the assembly of the required evidence in advance, securing authorisation for a planned intervention and the co-ordination of the range of partner services involved.

63. There is no role in place to deliver this function. Should Members approve the proposed approach, officers will investigate the potential to fund a pilot role utilising funding that may be secured from sources such as the Safer City Partnership's Proceeds of Crime Act funding pot.

64. There will be additional costs associated with the delivery of any action – such as translation, specialist advice, storage of belongings and specialist cleansing.

65. The City Corporation will offer provide emergency accommodation to those affected. Where this includes those without recourse to public funds (on a discretionary basis) this will be at the full cost to the City Corporation (other accommodation costs being offset by Housing Benefit). Recent action at Castle Baynard has cost the homeless budget almost £10,000 with costs continuing while accommodation is in place.

66. Interventions also require the resources of partners such as the City Police, homeless outreach services, the Community Safety Team and Cleansing Services.

## **Governance**

67. If supported, the policy and protocol would seek the approval of Community Children's Services and the Police Authority Board. It will be shared with other relevant committees for information.

## **Corporate & Strategic Implications**

### *Strategic implications*

68. The policy is developed in line with the commitments and values of the City Corporation's Homelessness and Rough Sleeping Strategy.

### *Financial implications*

69. Adoption of the proposed approach will have financial cost that are not currently budgeted for.

### *Resource implications*

70. There is no current resource in terms of operational co-ordination and planning.

*Legal implications*

71. Noted within the report.

*Risk implications*

72. Noted within the report

*Equalities implications*

73. The development of the policy will be subject to an Equality Impact Assessment.

*Climate implications*

74. None

*Security implications*

75. None

**Conclusion**

76. The development of a clear policy and operational framework in relation to addressing encampments will provide confidence and clarity about the use of interventions in relation to the detrimental impacts of rough sleeping.

**Appendices**

- 1 Legal Powers Summary
- 2 Draft Policy Position
- 3 Draft Protocol

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## Summary of key legal powers

Available Options	Description	Conditions	Requirements	Outcomes	Pros	Cons	Additional Information
<b>Anti-Social Behaviour, Crime and Policing Act 2014 (Section 1 injunction)</b>	Court ordered injunctions to prevent individuals from engaging in antisocial behaviour.	An individual has engaged or threatens to engage in antisocial behaviour (harassment, alarm or distress to any person).	Requires a known identity (specific person/s) – Not available to “persons unknown”.	Injunctions against specific individuals who are engaging in ASB.	Individual prohibited from doing anything described in the injunction.	Using the courts would create publicity and require the identities of individuals within the encampment.	Any evidence of anti-social behaviour must be specific to the individual named in the injunction.
<b>Public Spaces Protection Order</b>	Placing control of an area and everyone in it, implementing appropriate restrictions on antisocial behaviour.	Concrete risk to human health. Focus on the detrimental effect associated with the encampment (urination etc), rather than the tents being unsightly.  Restrictions must then be justifiable and proportional	Requires evidence of a detrimental effect on the quality of life of those in the locality  OR that the actions are likely to have such an effect.	The prohibiting of antisocial activities or orders for individuals to leave. This ultimately leads to the option of closing the walkway entirely.	Effective up to three years and can be extended.  PSPOs focus on the space, so a named individual is not required.	The nature and extent of the problem, existing measures, and less restrictive methods must all be examined before a PSPO is proposed.	Would operate as the closure of the walkway (assuming it has no other legitimate uses e.g. evacuation route).
<b>Community Protection Warning/Notice</b>	A requirement to stop doing specific things (antisocial behaviour) to prevent detrimental effects.	Conduct must have had <i>or is likely to have</i> a detrimental effect on the quality of life, must be persistent and continuing, must be unreasonable. Restrictions must be justifiable and proportional.	Requires a known identity (specific person/s) – Not available to “persons unknown”.	Collection of any item that was used in the commission of an offence (for destruction of disposal).  Instructions to vacate the area, not to return, and to remove all belongings.	There is no minimum detrimental effect, number of people, number of incidents or timeframe.	Any evidence of anti-social behaviour must be specific and linked to a named individual.	The language used for CPWs, CPNs and PSPOs are very similar with regards to detrimental effects on quality of life.
<b>Closure Order</b>	Allows the City to close the premises for immediate respite for the community	That land use has resulted in serious nuisance to members of the public.	Requires a person that has engaged or is likely to engage in disorderly/offensive/criminal	The walkway can be closed for a maximum of 3 months and can be extended for a further 3	This is a fast and flexible option.  It could be a potential option whilst longer term	This is only a temporary option and provides no long-term solutions.	It is unclear whether the walkway constitutes a premises.

	that is affected by antisocial behaviour.		nal behaviour.	months, if the court agree the test applies (therefore, a total of 6 months in total).	measures are pursued.		
<b>Highways Act 1980</b>	The removal of tents blocking a public highway.	It must be decided whether the tents constitute an obstruction	Requires the tents are determined to be obstructing the “free passage along the highway”	The highways act grants the power to remove any structure “erected or set up on” the highway.	Removal of the encampment	It is likely to create a large amount of public backlash.	

Other legal avenues of inquiry include:

- Breach of Planning Control,
- Public Health (control of diseases),
- Local legislation,
- Police Dispersal Powers.

Additionally, before any action is taken the City must:

1. Be able to justify its action as proportionate to the distress that is caused by the encampment.
2. Carefully consider the Human Rights of the homeless as they are recognised as a vulnerable group.
3. Build up a robust evidence base documenting the anti-social behaviour (ASB) of individuals within the encampment.
4. Complete an Equalities Impact Assessment regardless of which measure is chosen.
5. Conduct an option analysis of other steps that might be taken to deal with the problem before taking legal action (to explain why less restrictive options are inappropriate).



## **Appendix 2: policy Statement**

### **City of London Corporation - Tackling the detrimental impacts of rough sleeping**

#### **Supporting those who sleep rough**

The City of London Corporation is committed to assisting individuals who sleep rough in the Square Mile by providing tailored routes off the streets that address their specific needs and circumstances. The City Corporation resources a range of specialised services including outreach services, specialist hostel accommodations, a dedicated social worker, health and substance misuse services, and a newly established assessment centre offering emergency beds and a secure assessment space away from the streets.

Sleeping rough poses significant risks to the health, wellbeing, and safety of those experiencing homelessness. Street homelessness is hazardous, distressing, and isolating. Individuals sleeping rough are more susceptible to violence and serious health issues.

The City Corporation's services, along with those provided by its partners, prioritise the urgent need to support individuals in transitioning away from street homelessness and mitigating the harms associated with long-term rough sleeping.

#### **Supporting our communities**

Rough sleeping can also be associated with activities like begging, street drinking, substance misuse and other antisocial behaviour. Encampments of tents can block pavements or deter people from using them.

For those who live, work or learn in the City, these behaviours can be intimidating or have detrimental impact. Where they persist, they can cause distress and alarm.

Where there are specific concerns of crime and anti-social behaviour linked to rough sleeping the City Corporation and its partners in the City of London Police, have a responsibility to act.

We will always take a welfare first approach. Identification and consideration of a person's specific circumstances, including their safeguarding and support needs, are an integral part of the City Corporation's approach. However, where detrimental issues persist or are likely to persist, we will consider the use of legal powers and tools to intervene.

We will never use such powers on somebody just because they are sleeping rough or are homeless.

#### **Antisocial behaviour**

Anti-social behaviour is defined as conduct that has caused or is likely to cause harassment, alarm, or distress to one or more persons not of the same household.

Where anti-social behaviour is associated with rough sleeping our specialist homeless outreach teams, and our community officers from the City of London Police will work with individuals to try and address the behaviour and reduce the harm being caused.

If anti-social behaviours persist or escalate, we will consider the use of legal powers where there is evidence that the behaviour is unreasonable, persistent, and has a detrimental effect on the quality of life of numerous people and businesses in the locality.

Powers such as a Community Protection Notice – or others – will only be used where the behaviours experienced are well evidenced and meet the legal test required.

Where any power is used, the City Corporation will always continue to support those sleeping rough to end their homelessness.

### **Abandoned belongings**

Sometimes belongings are abandoned in the Square Mile, including sleeping bags, clothes and other personal possessions. We will only remove these if they appear obviously abandoned, if there is a public health risk, if they are causing an obstruction or if the owner tells us they no longer want them.

If belongings are left in the street and are not being cared for – for instance, they are strewn around rather than placed together – or are placed against a bin, we will treat them as litter and dispose of them. We also treat soaked and ruined bedding as litter.

### **Removal of sharps and needles**

We will always remove sharps and dispose of them safely.

### **Storage of abandoned belongings**

Unless there is an immediate public health risk or items are identified as litter, we will monitor abandoned items for 48 hours before removing them. We will store them for 28 days before disposing of them, and notify the police and outreach teams of their location.

### **Removal of tents or other personal possessions**

Confiscation and destruction of tents or other personal possessions is not and never will be part of our approach for reducing rough sleeping.

However, there are circumstances under which we are required to act to remove items. Environmental protection legislation means we have a duty to investigate what are known as “statutory nuisances”. These are activities which are – or are likely to be – a nuisance which poses a threat to health.

In cases of statutory nuisance, we speak to people first. If the behaviour continues, or no-one can be found, we have a duty to issue abatement notices. An abatement notice requires

whoever is responsible to stop or limit an activity to avoid causing a nuisance. It can include specific actions to reduce the problem.

Where tents are no longer being used as sleep sites and that were being used as somewhere to take class-A drugs. We have done this where a tent does not contain bedding and there are sharps inside or in the immediate area. We will also remove tents that have been left in clearly abandoned encampments.

If tents are on highways and causing an obstruction, they can be removed under section 149 of the Highways Act.

For tents causing nuisance on the highway e.g., uncontained/discarded belongings, noise, ASB related issues, a 28-day Notice of intention to remove can be served under the Highway Act 1980. This will be enforced with police in attendance if necessary and removed by City Clean / a contractor.

### **More information and how to help**

Find out more about our support and services for those sleeping rough [here](#).

If you are concerned about a rough sleeper, or sleeping rough yourself, you can report this online using the [Streetlink\(external link\)](#) website

You, or the individual you are concerned about, may also be able to use:

- [Providence Row\(external link\)](#) Day Centre  
82 Wentworth Street  
[E1 7SA\(external link\)](#)

If you see someone sleeping rough and you think they are suffering the effects of exposure to cold or extreme hot weather, please contact emergency services on **999**

Email the City Corporation's [Homelessness Prevention and Rough Sleeping Service](#)

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## **Appendix 3**

### **City of London Corporation - Tackling the detrimental impacts of rough sleeping operational protocol**

#### **1 Overview**

- 1.1 This protocol is designed to ensure that activity and intervention that addresses the detrimental impact of rough sleeping aligns with the vision and priorities of City Corporation's Homelessness and Rough Sleeping Strategy 2023-27.
- 1.2 The City Corporation's approach to rough sleeping will always focus on welfare. However, it is recognised that there will be instances where partnership intervention may be required in order to address specific concerns linked to rough sleeping associated crime and anti-social behaviour.
- 1.3 This protocol outlines the authorisation process to be used by City Corporation services and their partners, including the City Police, to ensure that activity is both appropriate and proportionate.
- 1.4 The protocol is designed to ensure consistency with regard to the decision making process and to ensure an increased level of communication with the senior officers relevant elected members.

#### **2 Definitions**

- 2.1 Rough Sleeping: sleeping outside or in places that are not designed for people to live in, including cars, doorways or abandoned buildings.
- 2.2 Encampments are defined by the Local Authority as "persons dwelling within temporary forms of accommodation – predominantly tents, and/or makeshift structures on land that is owned or maintained by the City Corporation or the Highway.

#### **3 Legal Framework and Compliance**

- 3.1 The protocol is influenced by the relevant statutory framework outlined within the following legislation:
  - Anti-Social Behaviour, Crime, and Policing Act 2014
  - Homelessness Reduction Act 2017
  - Highway Act 1980
  - Local Government Act (Miscellaneous Provisions) 1982 and/or the
  - Human Rights Act 1998
  - Housing Act 1996
  - s.187B Town and Country Planning Act 1990
  - Public Health (Control of Disease) Act 1984
- 3.2 All intervention activity within the scope of this protocol will align with the relevant legal obligations with regard to the need to fully respect the rights of individuals experiencing homelessness.

## **4 Engagement**

- 4.1 The City Corporation's specialist homeless outreach service operates daily in the Square Mile to engage with people who are rough sleeping, offering support, information about available services, and to assess their immediate needs.
- 4.2 For those in areas that may be subject to the use of enforcement powers, they will undertake risk assessments that will seek to identify risks relating to mental health, substance misuse and other relevant matters in order to support the development of tailored support. These will identify individual needs, and the capacity of individuals.
- 4.3 Intervention activities will be tailored to ensure the safety and well-being of vulnerable individuals, providing appropriate support and access to the relevant support services.

## **5 Planned Partnership Enforcement Activity**

- 5.1 The City of London Community Multi-Agency Risk Assessment Conference (Community MARAC) will consider issues of anti-social behaviour and crime associated with rough sleeping hotspots and encampments. If it recommends that enforcement action is necessary to tackle issues, formal authorisation will be sought.
- 5.2 City Corporation services shall not take part in any pre-planned enforcement or intervention activity which is likely to impact individuals or groups who are rough sleeping without written authorisation from the appropriate senior officers.
- 5.3 Enforcement activity shall only be considered in instances where there is specific intelligence which highlights a clear link between rough sleeping and crime and anti-social behaviour. In these instances enforcement/intervention activity shall be considered as a last resort option when offers of support have been refused.
- 5.4 The Community Safety Team submit a request for authorisation to be considered by the Executive Director of X and X. These will be submitted at least seven days prior to the planned activity
- 5.5 The request for authorisation will include:
  - An outline of the issue with key risks and a community impact assessment.
  - Details of the impact on any vulnerable individuals and proposed action to be taken to mitigate the impact.
  - Details of any outreach engagement and support activity delivered to date.
  - Explanation why enforcement action is being proposed (last resort option).
  - Evidence of relevant assessments of risk, equalities and human rights as appropriate
  - Confirmation that items will be cleared and stored unless it is appropriate to dispose of them
  - Confirmation that where items have been removed and stored the homeless outreach team shall continue to engage with those sleeping rough to agree the return of any possessions within an agreed timeframe
  - Confirmation that items shall only be disposed of once an agreement has been reached or if items have not been collected within an agreed timeframe

- Outline of any continued engagement and support to individuals sleeping rough to be provided post enforcement/intervention activity
- 5.6 The Community Safety Team will provide a briefing for relevant Members, Senior Officers and the Corporate Communications team.
- 5.7 The Community Safety Tea will produce follow-up debrief reports after any authorised enforcement and intervention related activity has been completed. Debrief reports/briefings shall be completed within one week of any on-street, pre-planned and coordinated enforcement/intervention activity.

## **6 Urgent Enforcement Planned Activity**

- 6.1 This protocol recognises that there are instances where enforcement/intervention action may be necessary in order to respond to high level risks such as any threat to life/public safety or the need to mitigate offending behaviour and the resultant impact on local communities.
- 6.2 The City Police shall utilise the relevant statutory powers (Community Protection Warning and Community Protection Notice) to address anti-social behaviour. The use of the statutory powers should only take place in instances where engagement activity has not resulted in a reduction or cessation in anti-social/offending behaviour.
- 6.3 Enforcement activity shall be regarded as a last resort option when outreach support offers have not been accepted by individuals sleeping rough.

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## City of London Corporation Committee Report

<b>Committee:</b> Homelessness and Rough Sleeping Sub-Committee	<b>Dated:</b> 09/12/2024
<b>Subject:</b> Post Rough Sleeping Initiative (RSI) Planning Update Report	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• <b>Delivers Corporate Plan 2024 –29 outcomes</b></li> </ul>	Links to Corporate Plan outcomes 1,2,3,4,10
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	NA
<b>What is the source of Funding?</b>	NA
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	NA
<b>Report of:</b>	Judith Finlay – Executive Director, Community and Children’s Services
<b>Report author:</b>	Will Norman – Head of Homelessness Prevention and Rough Sleeping

### Summary

This report provides Members with an update on our planning and risk mitigation for the period after the current tranche of Rough Sleeping Initiative (RSI) funding expires on 31 March 2025. It is an update on the position reported to Members at the Homelessness and Rough Sleeping Sub-Committee on 9 September 2024.

The report provides Members with an ongoing commentary on the risk presented by the lack of confirmed RSI grant funding from April 2025.

This report references the following priorities from the Homelessness and Rough Sleeping Strategy 2023–2027:

- Priority 1 – Rapid, effective and tailored interventions
- Priority 2 – Securing access to suitable, affordable accommodation
- Priority 3 – Achieving our goals through better collaboration and partnership
- Priority 4 – Providing support beyond accommodation

## Recommendation

Members are asked to:

- Note the report

## Main Report

### Background

1. The RSI formed part of the previous Government's Rough Sleeping Strategy, which set out the Government's vision to end rough sleeping by the end of the Parliament.
2. In February 2022, City of London officers submitted the 2022–2025 RSI proposal totalling £3,709,566. The core RSI award for 2024/25 is £1,373,840.
3. The current RSI award covers 15 projects, posts or funds. Most are funded by the RSI grant. Some are funded by a mix of RSI grant and City Fund, and some are shared with other local authorities from their respective RSI awards.
4. While an extension of funding (or an entirely new grant programme) is expected, the new Government is yet to confirm its spending commitment at a local or sub-regional level. The Government's budget statement on 30 October 2024 pledged £233 million nationally towards tackling rough sleeping in 2025/26.
5. Challenges emerging from the uncertainty around any grant award beyond April 2025 are:
  - At a local level, the amount of funding is unknown. If the funding amount is less than the current award, we will need to consider ending or amending current work funded through the RSI, or fund the work from the City Fund.
  - The timing of any grant determination has a bearing on decision-making. Some contracts are set to expire during 2024/25. Without notification of further funding, all contracts will need to end by 31 March 2025.
  - Any grant award for 2025/26 is expected to be limited to 12 months in duration.
6. Members of the Sub-Committee were informed in September that the Chamberlain's Department confirmed that three months of RSI programme service delivery (approximately £339,000), to cover the Quarter 1 period 2025/26, can be met from within the Homelessness and Rough Sleeping base budget. This is only required to allow officers to begin extending existing service contracts with providers in a way that avoids entering into unfunded commitments.

### Current Position

7. Following the welcome news of a £233 million commitment to dealing with rough sleeping in the October budget, local authorities and sub-regional bodies are now awaiting details about local grant awards. While no formal communication

regarding these awards has been received as yet, we do expect to hear from the RSI in December 2024.

8. Separate to the RSI programme, the Ministry of Housing, Communities & Local Government (MHCLG) has awarded £10 million to Greater London to fund work to alleviate winter demand pressures. Funds are being allocated to sub-regions, with £433,000 designated to North-East London. City officers are working with colleagues across the sub-region to design interventions that add capacity and diversity to the City of London's rough sleeping offer.
9. The working assumption is that RSI funding for 2025/26 will be a rollover of existing funding. Should this be the case, and inflation was not accounted for, the grant proposal submitted to MHCLG would need to take account of this through savings found from the existing programme.
10. The City and Tower Hamlets Navigator contract is set to expire, with no possibility of extension. Officers are currently designing a solution that sustains service delivery to the client group, but also returns a saving. This and other adaptations will ensure that the cost of the 2025/26 RSI programme falls within the value of the grant awarded by MHCLG.
11. Lessons from the evaluation undertaken by officers earlier in the year, together with findings from the Rough Sleeping Service independent review (scheduled for early 2025) will be used throughout 2025/26 to take advantage of any new three- to five-year grant programme.
12. Officers will update Members as and when any subsequent correspondence is received from MHCLG regarding a 2025/26 award or future longer-term programme.

### **Options**

13. There are no options for Members to consider.

### **Proposals**

14. There is no proposal for Members to consider.

### **Key Data**

15. There is no data related to this report.

### **Corporate & Strategic Implications**

16. Financial implications – none
17. Resource implications – none

18. Legal implications – none
19. Risk implications – none
20. Equalities implications – none
21. Climate implications – none
22. Security implications – none

## **Conclusion**

23. The Government has confirmed that £233 million will be made available nationally for local authorities to tackle homelessness in 2025/26. A decision about how this will translate into a grant programme is expected in December 2024.
24. MHCLG has awarded the North-East London sub-region £433,000 to help alleviate winter demand pressures.
25. A rollover of existing funding levels for 2025/26 is the most probable outcome, and officers have been planning for this outcome. This includes identifying areas where savings can be made to accommodate inflation within a grant funding envelope comparable to 2024/25.
26. The cost of the City of London RSI programme for 2025/26 will not exceed the size of the grant we are awarded.

## **Background papers**

- Post Rough Sleeping Initiative Planning Proposal Report – Homelessness and Rough Sleeping Sub-Committee – 4 March 2024
- Post Rough Sleeping Initiative Planning Proposal Report – Homelessness and Rough Sleeping Sub-Committee – 10 June 2024
- Post Rough Sleeping Initiative Planning Proposal Report – Homelessness and Rough Sleeping Sub-Committee – 9 September 2024

## **Appendices**

- None

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## City of London Corporation Committee Report

<b>Committee:</b> Homelessness and Rough Sleeping Sub-Committee	<b>Dated:</b> 09/12/2024
<b>Subject:</b> Statutory Homelessness – Use of Temporary Accommodation Report	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>• delivers Corporate Plan 2024–29 outcomes</li> <li>• provides statutory duties</li> </ul>	Providing Excellent Services
<b>Does this proposal require extra revenue and/or capital spending?</b>	No
<b>If so, how much?</b>	NA
<b>What is the source of Funding?</b>	NA
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	NA
<b>Report of:</b>	Judith Finlay – Executive Director, Community and Children’s Services
<b>Report author:</b>	Sinead Collins – Senior Housing Officer Will Norman – Head of Homelessness Prevention and Rough Sleeping

### Summary

This report provides Members with a summary of the City of London’s legal duty to accommodate households under the Housing Act 1996. The report sets out the legal basis for this and describes how demand for temporary accommodation has increased over recent years. The report also demonstrates the increased cost to the City of London in providing temporary accommodation.

### Recommendation

Members are asked to:

- Note the report.

## **Main Report**

### **Background**

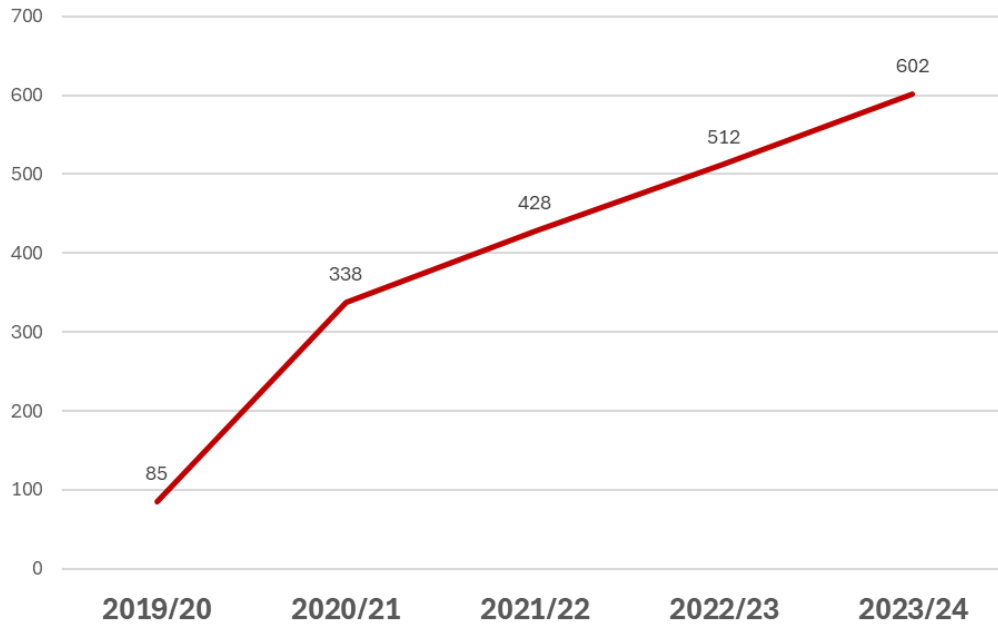
1. The Housing Act 1996, as amended by the Homelessness Reduction Act 2017 (HRA 2017) prescribes when an accommodation duty is triggered.
2. Section 188 of the Housing Act 1996 sets out an interim duty to secure accommodation where enquiries are being made into a homeless application. This duty arises when a local authority has reason to believe that an applicant may be homeless, eligible for assistance, and have a priority need.
3. Where a local authority has accepted a main housing duty to an applicant, Section 193 accommodation duty arises. This requires the local authority to ensure that the applicant has access to suitable temporary accommodation until the applicant is rehoused and the Section 193 duty is discharged.
4. If the local authority has notified an applicant that it proposes to refer the case to another local authority, the notifying authority has a duty under Section 199A to accommodate the applicant in temporary accommodation. The applicant stays in temporary accommodation until the conditions for referral are met and the receiving authority takes on the accommodation duty.
5. Where an applicant is dissatisfied with a local authority's Section 202 (S202) review decision, they have the right to appeal to the county court on a point of law arising from the review decision or original homelessness decision. The local authority can exercise a power to accommodate the applicant pending the outcome of the county court proceedings.
6. The City of London may also extend a discretionary offer of temporary accommodation to rough sleepers on an emergency and interim basis for a period of assessment to establish eligibility entitlement and move-on accommodation options. This option is also used to add additional, flexible capacity to alleviate emergency pressures, such as Severe Weather Emergency Protocol.

### **Current Position**

7. Due to the new and increased duties prescribed by the HRA 2017, we have seen a significant increase in demand for homelessness assistance since the introduction of the Act in April 2018 (see Graph 1).
8. As a result of the increase in approaches for homelessness assistance, the City has seen a steep increase in the need for suitable temporary accommodation (see Graph 2). This has been challenging for a number of reasons.
9. We have prepared this report to inform Members of the reasons for, and impact of, these increased duties. The report also demonstrates how the City has adapted to manage the increase in demand.

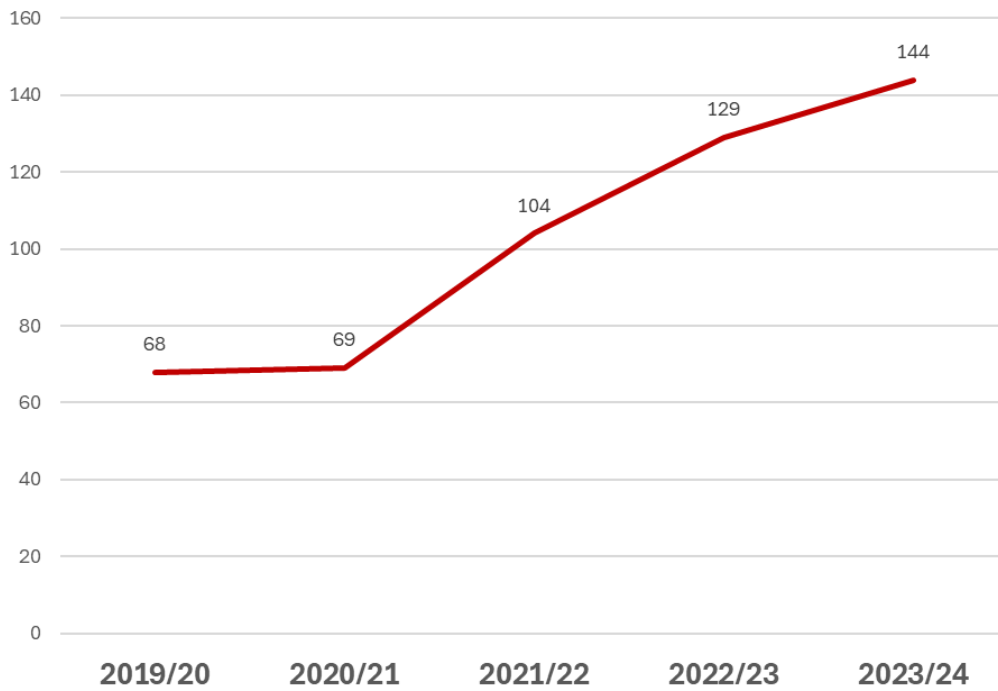
**Graph 1**

**Approaches for Emergency Housing Assistance**



**Graph 2**

**Temporary Accommodation Placements**



10. Graph 1 shows the rate at which potential applicants are contacting the City of London for advice and assistance due to a housing emergency. City of London officers have a duty to provide this assistance. While many of these contacts do not progress into legal duties, this trend is a helpful indication of the increase in demand which the sector is seeing. The data in Graph 1 represents a 608% increase in five years.
11. Graph 2 shows the number of households placed in temporary accommodation. The graph relates more closely to the content in this report and shows the increasing trend over five years.
12. For context, the following has been reported by London Councils on behalf of the 33 local authorities in Greater London:
  - Homelessness presentations continue to increase year on year, rising by 658 (9.1%) in July 2024 compared to a year earlier, based on data from 27 local authorities.
  - The number of households living in temporary accommodation in July 2024, reported by 27 local authorities, increased 10.2% to 61,423, in comparison to the same month of 2023 for which 55,726 households were reported, increasing by 5,661 households.
  - Data from 24 local authorities shows that the gross total monthly temporary accommodation spend for July 2024 is up 35.4% on the year before, reaching £93.1 million.
13. We have seen a reduction in the availability of suitably affordable accommodation for homeless households, particularly in the City of London and Greater London, due to the high rental costs. It is often difficult to manage the expectations of the increasing number of applicants.
14. The City has developed a local Temporary Accommodation Allocations Policy which outlines how we procure temporary accommodation and how we assess suitability. We ensure that applicants are placed in temporary accommodation within a reasonable distance to work, schools, and support networks.
15. Due to the unique nature of the City of London and the smaller number of approaches in comparison to other London local authorities, it is not cost effective for the City of London to lease properties for the use of temporary accommodation. This is because it is likely that rooms would remain empty while we continue to be subject to their rent costs. To maintain flexibility, we use temporary accommodation which is let at the more expensive nightly paid rate.
16. The length of time a household spends in temporary accommodation depends on which other legal duties are owed to the applicants.
17. Under the new duties in the HRA 2017, priority need households are offered temporary accommodation during the 56-day relief duty before the council consider



accepting the full housing duty. During this time, the household is likely to be placed in temporary accommodation.

18. The full housing duty is a requirement to provide temporary accommodation until such time as the duty is ended, either by an offer of settled accommodation, or for another specified reason. Settled accommodation may be social housing via the housing register, private sector housing, sheltered accommodation, or other suitable housing provisions.
19. For several reasons, we have faced challenges in sourcing suitable temporary accommodation across the homelessness sector.
20. In response to the COVID-19 pandemic, on 26 March 2020 the Government introduced the 'Everyone In' scheme. The Government asked local authorities in England to "help make sure we get everyone in", including those who would not normally be entitled to assistance under homelessness legislation. Some individuals placed in temporary accommodation were affected by furlough and their earnings were reduced. However, temporary accommodation was offered regardless.
21. The consequence of the cost-of-living crisis across the UK on households' finances and ability to cover their rental costs led to an increase in evictions and applicants asking for homelessness assistance.
22. The Domestic Abuse Act 2021 widened the definition of domestic abuse and placed further duties on local authorities to support victims seeking housing assistance. Under the Act, a person who is homeless as a result of being a victim of domestic abuse has an automatic priority need for accommodation and will be placed in temporary accommodation.
23. Due to the imminent introduction of the Renters Reform Bill, a significant number of private sector landlords have withdrawn their rental properties from the market. The Bill seeks to increase the rights of tenants, bans no-fault evictions, and intends to remove rogue landlords from the private rented market.
24. We have also seen a drive across the sector to increase building standards, which includes temporary accommodation. The Setting the Standard (STS) scheme is a Pan-London initiative focused on improving the quality of temporary accommodation provisions across London. The STS scheme deploys qualified Environmental Health Officers to inspect temporary accommodation properties. Where a property is assessed to be below acceptable standards, notifications are sent to all London local authorities to ensure that these properties are not re-let to homeless applicants.
25. The Home Office has increased demand on temporary accommodation providers. In some cases, it has taken provision away from the homelessness sector to accommodate the rising levels of National Asylum Support Service (NASS) leavers and arrivals from Ukraine and Afghan schemes.

26. The recent Early Prison Release initiative has also led to a requirement for probation services to seek and secure temporary accommodation for ex-offenders. This has also taken provision away from the homelessness sector.
27. In considering the increased demands for temporary accommodation and the difficulties sourcing suitable properties, the City sought and identified a temporary accommodation procurement and booking platform, Adam Housing.
28. In September 2024, the City moved to Adam Housing as its primary procurement vehicle for temporary accommodation. Adam Housing is a procurement framework which allows the City to procure temporary accommodation on a nightly rate basis from a list of accredited providers. The City is contracted to Adam Housing and not the provider.
29. The Adam Housing platform enables us to access extra temporary accommodation properties at more competitive rates. This will reduce difficulties in sourcing better quality temporary accommodation and reduce the City's overall cost for temporary accommodation.
30. To help the team adapt to increasing demand, additional capacity has been created through recruitment to new posts. Since 2019/20a Triage Officer post was added to strengthen our customer service functions and free up caseworker time. A Senior Housing Officer post has been created to add management oversight, and an additional Housing Officer post has been created. The current service consists of one Senior Housing Officer, two Housing Officers and a Triage Officer.

### **Options**

31. There are no options for Members to consider.

### **Proposals**

32. There are no proposals for Members to consider.

### **Key Data**

33. The table below shows the total upfront cost to the City of London (Homelessness and Rough Sleeping budget) of providing temporary accommodation to households eligible under the Housing Act 1996, and rough sleepers placed on a discretionary basis.

	<b>2021/22</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25 YTD</b>
Upfront temporary accommodation costs	£562,409	£853,276	£1,029,756	£519,579

34. The figures above are derived from the nightly rate fees charged by our temporary accommodation providers which the City of London must pay to fund the placement. Approximately 80% of this cost is recovered through Housing Benefit, and some discretionary spending on rough sleepers is funded through the Rough Sleeping Initiative grant.

## **Corporate & Strategic Implications**

- 35. Strategic implications – None
- 36. Financial implications – None
- 37. Resource implications – None
- 38. Legal implications – None
- 39. Risk implications – None
- 40. Equalities implications – None
- 41. Climate implications – None
- 42. Security implications – None

## **Conclusion**

- 43. The City of London's duty to place individuals and households in temporary accommodation falls under Sections 188, 913 and 199A of the Housing Act 1996. Also, the City of London places rough sleepers in temporary accommodation on a discretionary basis as a way of adding flexible capacity to our rough sleeping pathway, and to help alleviate winter pressures.
- 44. The number of people seeking advice and guidance has increased sixfold (608%) since 2019/20. This can be accounted for by changes to the law implemented by the commencement of the Homelessness Reduction Act in 2018, and an increase in the number of people experiencing housing jeopardy.
- 45. The number of households placed in temporary accommodation has increased by 111% since 2019/20. This figure represents the number of households eligible for assistance from the City of London, and where homelessness has not been prevented.
- 46. In 2023/24, the City of London spent £1,029,756 securing temporary accommodation. This is almost double what was spent in 2021/22 (£562,409). The increase reflects rising demand and the rising cost of temporary accommodation.
- 47. The Statutory Homelessness Team has adapted to increasing demand through the creation of new posts to maintain high customer service standards, and to add management oversight and casework capacity.

## **Appendices**

- Appendix 1 – City of London Temporary Accommodation Allocations Policy

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## **City of London Corporation** **Temporary Accommodation Allocation Policy**

1.1 This Temporary Accommodation Allocation Policy will provide a framework for the fair allocation of temporary accommodation provided by the City of London Corporation under *sections 188, 190 or 193 Part VII of the Housing Act 1996 (the Act) as amended by the Homelessness Act 2002, Localism Act 2011, Homelessness Reduction Act 2017 and Domestic Abuse Act 2021.*

### **Procurement**

2.1 All temporary accommodation provided by the City of London Corporation is spot purchased and nightly-paid. This enables each temporary accommodation placement to be made with the needs of a specific applicant in mind. This also means that when a s193<sup>1</sup> duty is discharged, the unit of accommodation can be returned to the landlord and, for the next applicant, the search for suitable accommodation will begin afresh.

2.2 This procurement policy is made possible by the relatively low number of homeless applications that the City of London Corporation receives. Should this number substantially increase, or the availability of nightly-paid accommodation decrease, the preference for nightly-paid accommodation instead of long-term leases would need to be reviewed.

### **Assessment of suitable locations**

3.1 If the City of London Corporation has a duty to secure accommodation for a homeless applicant, an assessment will be carried out to determine in which areas it may be suitable for this accommodation to be provided.

3.2 The same location suitability principles apply to accommodation provided under s188<sup>2</sup>, s190<sup>3</sup> and s193 of the Act. However, interim accommodation under s188 may need to be sourced at short notice. It may also be reasonable to expect a household to tolerate conditions for a short period which would be unsuitable over a number of weeks. Paragraph 17.7 of the *Homelessness Code of Guidance for Local Authorities* (the Code) therefore allows for a degree more flexibility when making an offer of s188 accommodation.

3.3 The assessment will take into account all factors that give an applicant a significant link to the City of London or, should they have previously been living elsewhere, to their home borough. It will assess whether a temporary accommodation placement would have the potential to cause significant disruption to:

- i. the applicant's (or any member of their household's) employment. Applicants who are on parental leave from employment will have their location needs assessed on the same basis as all other employees;

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<sup>1</sup> Section 193 is the full housing duty. This gives the housing authority a duty to secure that accommodation is available for the applicant. This duty is usually brought to end when the applicant accepts an offer of accommodation under Part VI (allocation from the housing register).

<sup>2</sup> Section 188 is interim accommodation provided while an authority's enquiries into an applicant's homeless application are underway.

<sup>3</sup> Section 190 requires the provision of accommodation for a reasonable period to applicants who have been found intentionally homeless. This is likely to be the same as their s188 accommodation and is unlikely to involve a fresh search.

- ii. the applicant's (or any member of their household's) caring responsibilities. Account should be taken of the type and importance of the care household members provide and the likely impact the withdrawal would cause, including the cost implications to the City of London Corporation or another local authority should the informal care arrangement break down due to a change of location;
- iii. the applicant's (or any member of their household's) education. While disruption to educational and support networks may be harmful to the welfare of all children, additional weight should be given to students due to take externally assessed examinations and to students with a SEN statement at a particular school;
- iv. the continuity of medical, social services and other care received by the applicant (or any member of their household);
- v. the ability of the applicant (or any member of their household) to continue to receive support from their local support network, where this is essential to their well-being;
- vi. any other special reason the applicant (or any member of their household) has for retaining links to their home borough, which is essential to their well-being.

3.4 The above factors are not intended to provide an exhaustive list. Any other reasons that have emerged during the course of the City of London Corporation's enquiries or that are offered by an applicant in support of a placement close to their home borough should be given full consideration.

3.5 An applicant's circumstances should also be viewed holistically. For example, a placement in a neighbouring borough may not, by itself, significantly disrupt an applicant's ability to reach their place of work. However, if their employment is dependent on childcare provided by a family member in a third borough, the combined journey to the childcare provider and then workplace may amount to a significant disruption.

3.6 In the absence of any other factors, the City of London Corporation views a total, one-way travelling time to an applicant's place of employment of around ninety minutes as reasonable. This will be by the fastest method of public transport that is both affordable to the applicant and available at the time their employment commences and finishes.

3.7 This outcome of this assessment will be used to define the maximum geographic scope of the City of London Corporation's search for temporary accommodation.

### **Sourcing accommodation**

4.1 Section 208(1) of the Act requires housing authorities to secure accommodation within their district, in so far as is reasonably practicable. This assumes that applicants will be applying to the district in which they currently live. This is not the experience of the City of London Corporation and most of our homeless applicants work in the City of London but reside elsewhere.

4.2 Paragraph 17.51 of the Code states that housing authorities should wherever possible, secure accommodation that is as close as possible to where an applicant was previously living, so they can retain established links with schools, doctors, social workers and other key services and support essential to the well-being of the household.

- 4.3 Therefore, when seeking to procure temporary accommodation for an applicant, the City of London Corporation will begin its search in the district where the applicant most recently resided.
- 4.4 Paragraph 17.6 of the Code states that the exception to this is where there are clear benefits for the applicant of being accommodated outside of the district. In these cases, such as an applicant at risk of domestic abuse, the City of London Corporation will seek temporary accommodation in the nearest district that is safe for the applicant, so as to enable the applicant to maintain links with support networks and services where possible.
- 4.5 The introduction of the Domestic Abuse Act 2021 in July 2021 provided additional suitability criteria for accommodation sourced for applicants fleeing domestic abuse. These are detailed under chapter 21 of the Code. To summarise, it states that for accommodation to be suitable for this cohort, the City of London Corporation must consider the following:
- i. Any risk of violence or racial harassment in a particular locality;
  - ii. Areas and properties that would not be found by the perpetrator;
  - iii. Any additional security measures or trained staff that can be provided at the property;
  - iv. Whether mixed-gender accommodation is appropriate and seek to provide single-sex accommodation where required and available.
- 4.6 Part IV of the Domestic Abuse Act 2021 also introduced new support in safe accommodation duty that came into effect in October 2021. The temporary accommodation duty and homelessness legislation will apply regardless of the local authority's safe accommodation provision, however, where available, it must be considered for applicants fleeing domestic abuse. The City of London Corporation's safe accommodation provision is detailed further in section 5 of this policy.
- 4.7 Section 206(1) of the Act requires that any unit of accommodation provided by the City of London Corporation or secured from some other person in fulfilment of a housing duty must be available to and suitable for the applicant. Further detail on availability and suitability is provided in chapter 17 of the Code. For the purposes of this Allocations Policy, it is important to note that accommodation must be:
- i. affordable, taking account of the applicant's financial resources and living expenses;
  - ii. of suitable space and arrangement for the applicant and their household, in the light of their relevant needs, requirements and circumstances;
  - iii. free from Category 1 HHSRS<sup>4</sup> hazards, including overcrowding;
  - iv. as close as possible to where an applicant was previously living.

### **Safe accommodation**

- 5.1 In October 2021, Part IV of the Domestic Abuse Act 2021 introduced a new support in safe accommodation duty for local authorities that allowed for additional support to be provided for victims of domestic abuse in safe accommodation.

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<sup>4</sup> The Housing Health and Safety Rating System allows for the objective assessment of twenty-nine categories of housing hazard, including overcrowding. Any breach of the room and space standards under Part X of the Housing Act 1985 is also likely to constitute a Category 1 hazard.

5.2 'Safe accommodation'<sup>5</sup> is defined in Regulations following the introduction of the Domestic Abuse Act 2021.

5.3 The City of London Corporation has provision of six self-contained studio flats in a single-sex building, outside of the City of London borough. This accommodation is managed by the Corporation's Homelessness Team and will be allocated to vulnerable single female homeless applicants and rough sleepers who are fleeing or have experienced domestic abuse and may require additional support from domestic abuse or outreach services.

5.4 Placements will be allocated by an assessing officer during the full housing assessment or following referral from rough sleeping services. If an applicant is assessed as requiring safe accommodation, but there are no voids in the City's safe accommodation provision, the City of London Corporation will endeavour to secure a refuge placement, or another self-contained accommodation in a single-sex space provided by a private temporary accommodation provider.

### **Accommodation outside an applicant's home borough**

6.1 While the City of London Corporation will endeavour to place all households within the borough where they were previously living, it may not always be possible to procure a unit of accommodation in the district that is available, affordable and suitable. In these cases, the City of London Corporation will continue its search in the boroughs adjacent to the district in which the applicant was previously living.

6.2 Section 48 of the *Supplementary guidance on the homelessness changes in the Localism Act 2011 and on the Homelessness (Suitability of Accommodation) (England) Order 2012* states that where accommodation which is otherwise suitable and affordable is available nearer to the authority's district than the accommodation which it has secured, then the accommodation which it has secured is not likely to be suitable.

6.3 The City of London Corporation will therefore exhaust the search for suitable accommodation within an applicant's home borough before beginning a search in the adjacent boroughs. The search in these boroughs must be exhausted before a search begins in the second tier of adjacent boroughs.

6.4 Where an applicant accepts an offer of temporary accommodation outside of the City of London, the City of London Corporation will, in compliance with s208(2) of the Act, notify the housing authority in whose district the accommodation is situated of the name of the applicant, the number and description of other persons who normally reside with the applicant or might reasonably be expected to do so, the address of the accommodation, the date on which the accommodation was made available and which function the housing authority is discharging in securing the accommodation. This notice will be given in writing within 14 days of the accommodation being made available to the applicant.

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<sup>5</sup> Safe accommodation is defined as 'relevant accommodation' in Part 2 of The Domestic Abuse Support (Relevant Accommodation and Housing Benefit and Universal Credit Sanctuary Schemes) (Amendment) Regulations 2021. It is accommodation which is provided by the local authority, registered charity, or private registered provider of social housing, not bed and breakfast accommodation, and accommodation which is either a refuge, specialist safe accommodation, dispersed accommodation, second stage accommodation or other accommodation designated by the local authority as domestic abuse emergency accommodation.



### **Limits to out of borough placements**

- 7.1 The search for suitable accommodation cannot continue expanding outwards from an applicant's home borough indefinitely. Under the supplementary guidance discussed in 5.2, a failure to complete a search in a nearer borough means accommodation in a further borough is likely to be unsuitable. The reverse does not hold, and a placement in a distant borough does not become suitable simply because nothing suitable can be found closer.
- 7.2 When making an out-of-borough placement, the City of London Corporation will remain within the confines of the assessment of suitable locations set out in section 3 of this policy.
- 7.3 In addition, the City of London Corporation understands that all its homeless applicants will have links to Greater London, either through employment, family or other networks. For this reason, we regard any temporary accommodation placement outside of the M25 as unsuitable.
- 7.4 Paragraph 17.56 of the Code states that housing authorities should avoid placing applicants in isolated accommodation away from public transport, shops and other facilities. This requirement was repeated in the *Homelessness (Suitability of Accommodation) (England) Order 2012*. The City of London Corporation will not make out-of-borough placements where an applicant would have difficult accessing general amenities or transport.

### **Difficult cases**

- 8.1 There may be cases where it is not possible to procure accommodation which meets all the above criteria as fully as we would like. It may prove difficult to reconcile finding appropriate location, other aspects of suitability and time spent waiting in interim accommodation for a suitable temporary placement to be found.
- 8.2 Applicants' preferences on how to respond to these compromises will vary. In these cases, officers will consult with applicants and take their preferences into account.

### **Exceptions to the policy**

- 9.1 A general exception to all aspects of this policy exists where an applicant expresses a preference for accommodation further away from their home borough than the policy suggests would be appropriate. In these cases, the City of London Corporation will endeavour to act in line with an applicant's wishes.

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## City of London Corporation Committee Report

<b>Committee:</b> Homelessness and Rough Sleeping Sub-Committee	<b>Dated:</b> 09/12/2024
<b>Subject:</b> Homelessness Rough Sleeping Coproduction Programme – Introduction Report	<b>Public report:</b> For Information
<b>This proposal:</b> <ul style="list-style-type: none"> <li>delivers Corporate Plan 2024-29 outcomes</li> </ul>	Diverse Engagement Communities Proving Excellent Services
<b>Does this proposal require extra revenue and/or capital spending?</b>	N/A
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	Yes
<b>Report of:</b>	Judith Finlay, Executive Director of Community and Children’s Services
<b>Report author:</b>	Kirsty Lowe, Rough Sleeping Services Manager

### Summary

The report provides a summary of work carried out by the City of London’s (CoL’s) Rough Sleeping Team and commissioned specialist advocacy and coproduction services from 2019 to the present.

The Rough Sleeping Initiative (RSI) grant fund continues to fund the coproduction service delivered by the homelessness charities, Groundswell, and Mayday Trust. Funding ends on 31 March 2025. However, where grant funding is confirmed, the intention is to extend the contract with the current providers for a further year.

### Recommendation

Members are asked to:

- Note the report.

## Main Report

### Background

1. In 2019, the Healthier City and Hackney Fund funded Groundswell, a leading homelessness advocacy organisation, to provide health assistance to City residents. The service was not able to fully deliver the work as intended, which resulted in an opportunity to repurpose an underspend of the budget elsewhere.
2. In 2020–2021 the Rough Sleeping Team repurposed the underspend and worked with Groundswell and an independent researcher, Becky Rice, to carry out interviews with those who had slept rough in the City and who had recently been accommodated in the temporary City Assessment Service (CAS). CAS was commissioned in response to the government's 'Every One In' approach to protect and preserve life due to the COVID-19 pandemic. All people who were met rough sleeping in the City were offered accommodation, predominately at CAS, which was the first rough sleeping accommodation within the Square Mile.
3. The aim of this piece of work was to hear from those with lived experience about why they had decided to come in off the streets and engage with services such as CAS, many for the first time. Groundswell and Becky Rice produced the *City Voices* report, which set out recommendations based on the wants and needs of the service user. The report went on to shape and guide decisions to commission the permanent assessment service, Snow Hill Court.
4. In 2021, the findings of *City Voices* was shared with senior City officers and Members from the Homelessness and Rough Sleeping Sub-Committee through a series of workshops facilitated by Groundswell. Members confirmed ongoing support of the Homelessness and Rough Sleeping Team's ambition to work and commission services in a more coproduced way.
5. Coproduction is a way of working together to create positive change. Coproduction seeks to maximise the involvement of people who have experienced a problem or challenge in identifying and solving that problem. This might include designing, commissioning, delivering, improving, or evaluating services.
6. 2022 marked the first year of the multi-year RSI grant funding. RSI funds enabled the City to commission a multi-year advocacy/coproduction service. Groundswell was awarded Phase 1 of the three-year plan in 2022. This involved consultation of a broader group of services users, including those currently sleeping rough and those across the accommodation pathway.
7. By 2023 the Phase 1 consultation report was complete. It recommended that the City directly commission a coproduction service. The contract was awarded to Mayday Trust and Groundswell.

## Current Position

8. The coproduction service delivered by Mayday Trust and Groundswell began in November 2023. The focus for the first six months was to recruit the team, and all posts have now been filled. The team is made up of four staff members who deliver on three main areas:
  - a) **Advisory Group:** Members are made up of diverse individuals with lived experience of homelessness and/or rough sleeping. Members are working with, or have previously worked with City rough sleeping/homelessness services. The Advisory Group and City officers meet monthly to discuss the group's ambition to share insight, knowledge, and plan how the City and commissioned services can be improved and coproduced. There have been nine Advisory Group meetings between February 2024 and September 2024.
  - b) **Champions:** Each rough sleeping and accommodation support service has a nominated champion. Professionals meet every month to discuss the importance of coproduction, the ways in which their services deliver coproduction, and to highlight potential barriers to delivering coproduction. There have been seven champions meetings between February 2024 and September 2024.
  - c) **Workshops/promotion:** This group sets up and facilitates four coproduction workshops attended by leaders and decision-makers from across the CoL and all homelessness commissioned organisations. The workshops are an opportunity to share good practice but also to agree next steps for how the City will commission and deliver coproduced homelessness services. There have been two workshops delivered to date, with a running theme of 'power dynamics'. The first workshop focused on the importance of moving away from the traditional focus on 'curing' individuals by targeting mental health disorders. Instead, it looked at prioritising policy innovations that address the issues at the population level. The second workshop focused on coproduction, what this means to the group, and how change can be implemented in all areas of work.
9. Funding for the coproduction service will end on 31 March 2025. We hope to continue to fund this service for another year if we are awarded 2025–2026 RSI grant funding.

## Corporate & Strategic Implications

10. Strategic implications – none
11. Financial implications – Funding ends on 31<sup>st</sup> March 2025
12. Resource implications – none
13. Legal implications – none
14. Risk implications – none

15. Equalities implications – none

16. Climate implications – none

17. Security implications – none

## **Conclusion**

18. The City has been developing its understanding of coproduction and the importance of coproduced homelessness support services over the past five years. This has resulted in the commissioning of the first Homelessness and Rough Sleeping Coproduction service, delivered by Mayday Trust and Groundswell.

19. To date the project has developed an Advisory Group of people with lived experience, developed a Champions group of professionals working to deliver homelessness services. The project has also facilitated two workshops, bringing together leaders in the City and the sector to commit to commission and deliver services in a more coproduced way.

20. The ambition of the Homelessness and Rough Sleeping Team is to continue to develop services in this area through continued commissioning of the current service, so long as RSI grant funding is awarded in 2025.

## **Appendices**

- None

## **Background Papers**

- [\*City Voices: Learning from the response to rough sleeping in the City of London during COVID-19\*](#)

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

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