



Homelessness and Rough Sleeping Sub Committee

Date: MONDAY, 3 FEBRUARY 2025

Time: 4.00 pm

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

Members:

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

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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 December 2024.

For Decision
(Pages 5 - 10)

4. **HOMELESS LINK GUEST**

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

For Discussion

5. **CITY OF LONDON POLICE UPDATE**

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

For Information
(Pages 11 - 12)

6. **SEVERE WEATHER EMERGENCY PROTOCOL (SWEP) UPDATE REPORT
FEBRUARY 2025**

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

For Information
(Pages 13 - 26)

7. **AN OVERVIEW OF ARRANGEMENTS TO SUPPORT AND SAFEGUARD ADULTS
WITH CARE AND SUPPORT NEEDS WHO ARE ROUGH SLEEPING OR
HOMELESS**

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

For Information
(Pages 27 - 30)

8. **ANNUAL ROUGH SLEEPING SNAPSHOT 2024 REPORT**

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

For Information
(Pages 31 - 36)

9. **ROUGH SLEEPING PREVENTION AND RECOVERY GRANT 2025/26 UPDATE REPORT**

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

For Information
(Pages 37 - 40)

10. **HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2027 UPDATE REPORT**

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

For Information
(Pages 41 - 60)

11. **POLICY AND PROTOCOL TO TACKLE THE NEGATIVE IMPACTS OF ROUGH SLEEPING**

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

For Information
(Pages 61 - 104)

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

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

14. **EXCLUSION OF THE PUBLIC**

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

For Decision

Part 2 - Non-Public Agenda

15. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 9 December 2024.

For Decision
(Pages 105 - 106)

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

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

For Information

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

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

HOMELESSNESS AND ROUGH SLEEPING SUB COMMITTEE

Monday, 9 December 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)	Deputy Alpa Raja
Deputy Natasha Maria Cabrera Lloyd-Owen (Deputy Chairman)	James Breed
Anne Corbett	Patrick Fowler
Helen Fentimen OBE JP (Ex-Officio Member)	Irmani Smallwood

In Attendance:

Judith Pleasance

Officers:

John Barker	- Chamberlain's Department
Sinead Collins	- Community & Children's Services Department
Chief Inspector Nikki Gander	- City of London Police
Kirsty Lowe	- Community & Children's Services Department
Will Norman	- Community & Children's Services Department
Chris Pelham	- Community & Children's Services Department
Blair Stringman	- Town Clerk's Department
Chandni Tanna	- Town Clerk's Department
Ian Tweedie	- Community & Children's Services Department

1. **APOLOGIES**

Apologies were received from Anne Corbet and Henrika Priest.

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 9th December 2024.

4. **CITY OF LONDON POLICE UPDATE**

The Sub-Committee received a report of the Commissioner of the City of London Police concerning an update on rough sleeping and begging in the City.

The following points were noted:

- **Begging and Welfare Approach:** The police continue to issue warning notices to individuals found begging, providing them with details on

where they can get help and outreach support. The goal is to encourage them to seek assistance and not continue begging within the city.

- **Ticketing and Enforcement:** During the reporting period, 20 green tickets, 9 amber tickets, 3 red tickets, and 1 blue ticket were issued. The blue ticket case is under consideration for a full Criminal Behaviour Order (CBO). The individual who received a CBO during the summer has not been seen back in the city.
- **Hub Attendance:** The attendance at the hub, which provides welfare and diversion support, has been mixed. The hub is crucial for offering support before any enforcement action is taken. Proactive days are scheduled to ensure immediate support for those found begging.
- **Rough Sleeping and Tented Encampments:** The police are working with various partners to address rough sleeping and tented encampments at Peninsula House and Castle Baynard St. The approach balances the needs of rough sleepers with the safety and welfare of the local community.
- **Incidents and Safety:** There was a non-fatal stabbing incident between two rough sleepers at Castle Baynard St, and an arson incident at Peninsula House. Both incidents are being closely monitored, and the police are working with partners to reassess risks and provide support.
- **Snow Hill Assessment Centre:** The police continue to engage with the management, staff, and neighbours of the Snow Hill Assessment Centre to address any issues and identify solutions.

5. HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023–2027 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 2023–2027.

The following points were noted:

- **Progress Against Aims:** The report provided a summary of progress against the aims set out in the current strategy. Out of 38 actions, 13 have been completed, which is three more than in the last period. One new action has been added, bringing the total number of actions to 471.
- **Performance Scorecard:** Despite a headline trend indicating rising rough sleeping, there was a slight decrease in rough sleeping in Q2. However, there was an increase in rough sleepers using encampments, possibly due to additional work at Castle Baynard St and Peninsula House. Accommodation outcomes increased slightly by quarter but were significantly higher this year compared to the same period last year.
- **Priority Area 3 - Working Collaboratively:** There was a discussion about the duty to refer, with questions about the predominant sources of referrals and the quality of the details provided. It was noted that probation services, hospitals, and other homelessness support services are the main sources of referrals.
- **SWEP Activation:** The Severe Weather Emergency Protocol (SWEP) was activated once so far, from 19 to 21 November, and extended to 25 November. A total of 40 people were placed in SWEP, with 88 offers made. This was the highest uptake to date, with 50% of offers accepted.

- **Resource Gap:** There was a discussion about the resource gap and the need for a paper outlining what resources would be required to have a more flexible or lower threshold for SWEP activation. It was suggested that understanding the resource implications would help in taking conversations forward in the most appropriate places.

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

The Sub-Committee received a report of the Executive Director, Community & Children's Services concerning the City of London response to the Ministerial Letter on Rough Sleeping.

The following points were noted:

- The City of London Corporation's response to the ministerial letter on rough sleeping was discussed. The report highlighted recommendations regarding safeguarding and rough sleepers, including governance, structure, accountability, strategic plans, and safeguarding adult reviews.
- Officers explained that the City of London has a mature system in place for both internal structure and engagement with the board. Rough sleeping services and adult social care are represented on the board by the assistant director.
- The City of London will include a section on rough sleeping in its annual report, featuring case studies and a new process for reviewing deaths of rough sleepers.
- A Member raised a concern about the process for individuals who die in hospital after being admitted from the street. Officers clarified that the process would still apply, and the local authority would be informed, triggering a follow-up.
- There was a request for a definition of the homelessness fatality review for better understanding, which will be followed up in the next committee meeting.

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

The Sub-Committee received a report of the Executive Director, Community & Children's Services concerning a draft policy statement and protocol in support of interventions to tackle the detrimental impacts of rough sleeping.

The following points were noted:

- **Draft Policy Statement and Protocol:** The report presented a draft policy statement and protocol to support interventions aimed at tackling the detrimental impacts of rough sleeping. It highlighted the harms to individuals from long-term rough sleeping and the negative impact on communities from behaviours associated with rough sleeping.
- **Specialist Services:** The City of London Corporation is committed to supporting those who sleep rough in the Square Mile by providing tailored routes off the streets that address their specific needs and circumstances. This includes specialist outreach services, 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.

- **Risks and Impacts:** The report noted the significant risks to the health, wellbeing, and safety of those experiencing homelessness. Street homelessness is hazardous, distressing, and isolating, making individuals more susceptible to violence and serious health issues.
- **Community Support:** 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.

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

- **Planning and Risk Mitigation:** The report provided an update on planning and risk mitigation for the period after the current tranche of RSI funding expires on 31 March 2025. It highlighted the need to continue providing support services to individuals who have experienced rough sleeping, including ongoing access to mental health services, substance misuse support, and housing assistance.
- **Long-term Housing Solutions:** Members were informed about 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.
- **Collaboration with Partners:** The success of the initiative relies on collaboration with partner organisations, such as local authorities, health services, and voluntary organisations. Regular monitoring and evaluation of the initiative's implementation are planned to ensure its effectiveness.
- **Community Engagement:** 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.

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

The Sub-Committee received a report of the Executive Director, Community & Children's Services concerning a summary of the City of London's legal duty to accommodate households under the Housing Act 1996.

The following points were noted:

- **Legal Duty and Demand:** The report provided a summary of the City of London's legal duty to accommodate households under the Housing Act 1996, as amended by the Homelessness Reduction Act 2017. It described how the demand for temporary accommodation has increased over recent years.
- **Increased Costs:** The report demonstrated the increased cost to the City of London in providing temporary accommodation. This includes the financial implications of meeting the legal requirements to secure accommodation for eligible applicants.

- **Accommodation Duty:** 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.
- **Main Housing Duty:** When 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 they are rehoused and the Section 193 duty is discharged.

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

The Sub-Committee received a report of the Executive Director, Community & Children’s Services concerning 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 following points were noted:

- **Overview:** The report provided an overview of the work done by the rough sleeping team and commissioned services like Groundswell and Mayday over the past five years to design, commission, and deliver services in a participatory way with those who have lived experience.
- **Definition of Co-production:** Co-production was defined as a way of working together to create positive change by involving people who have experienced a problem in identifying and solving it. This includes designing, commissioning, delivering, improving, or evaluating services.
- **Funding:** The Co-production service is fully funded by the Rough Sleeping Initiative (RSI) grant, which is currently secured until March 31, 2025. Future funding is uncertain.
- **Challenges and Successes:** The advisory group, consisting of individuals with lived experience, has had mixed success. The team aims to diversify the group to better reflect the experiences of all clients.
- **Commissioning Strategy:** A Member suggested that the City of London should require organisations receiving income to have their services reviewed and fed back on by users. This idea was acknowledged as beneficial but noted that practical implementation would need careful consideration.
- **Future Plans:** The team plans to continue growing the advisory group and ensuring that future services, such as the city outreach team, are fully co-produced with input from those with lived experience.
- **General Support:** There was general support for the Co-production approach, with recognition of its positive impact on service delivery and the importance of involving those with lived experience in the process.

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

There were no questions.

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

There was no other business.

13. **EXCLUSION OF THE PUBLIC**

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

14. NON-PUBLIC APPENDIX

Members discussed the non-public appendix which was received on conjunction with item 5 on the agenda.

15. CITY OF LONDON POLICE NON-PUBLIC UPDATE

There was no non-public update from the City of London Police.

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

The Sub-Committee received a verbal update of the Executive Director, Community & Children’s Services.

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

There were no non-public questions.

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

There was no other business.

The meeting closed at 6.15 pm

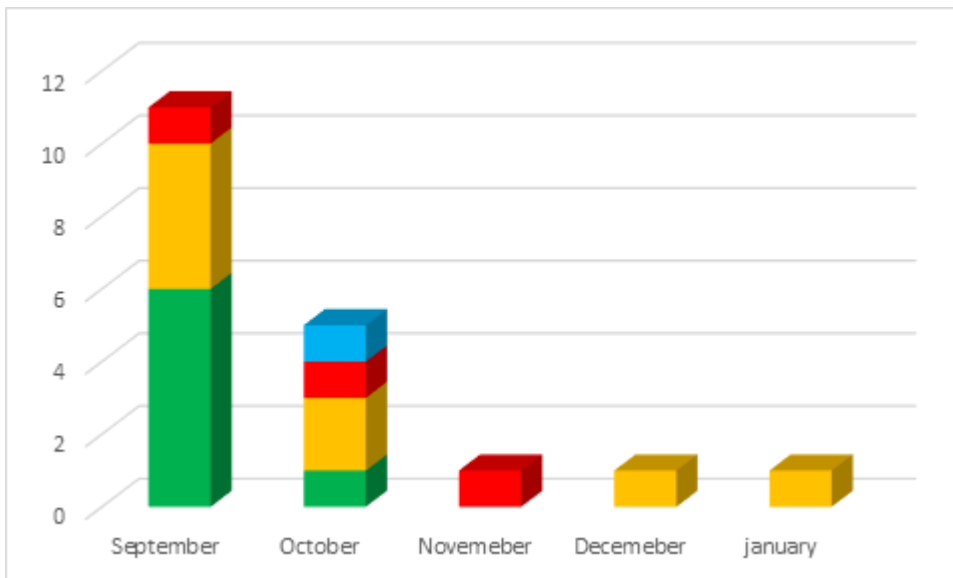
Chairman

Contact Officer: Blair Stringman
blair.stringman@cityoflondon.gov.uk

Meeting: City of London Homeless and Rough Sleeper Sub Committee	Date(s): 21 st January 2025	Item no. TBC
Subject: City of London Police update on Begging/rough sleeping		
Report of: Chief Inspector Nikki Gander		
Document Classification: Official		
For Information/Decision: 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. People found begging within the City are referred to the hub as an alternative to continued begging. This partnership hub takes place fortnightly at St Botolph’s Church Hub with Turning Point and Thames Reach/Out-Reach Team in attendance with a view to assessment and offers of support. CoLP and Parkguard also attend. Practical support such as food/clothes are also available here. Those who continue to beg receive several warnings “tickets” which are further referrals to the hub, before eventually being prosecuted for the offence, at which point Community Behaviour Orders are also considered.

Tickets issued 1st September 2024 - 18th January Green 7, Amber 8, Red 3 and Blue 1.



One CBO application was applied for on conviction for breaching the red ticket. This was heard at court on 6th January 2025 but the court refused the CBO application due to their previous convictions last being 2017.

The hub is an essential element of Operation Luscombe to ensure that a support referral mechanism is in place to provide alternatives to begging, and prevent the need for enforcement. Police Funding for the hub stops in April 2025. Alternatives are being discussed.

Proactive Luscombe days are in place with dedicated officers on the day of the Hub being tasked to identify those begging and refer them to the hub “live-time” as a means of prevention.

Rough-Sleeping within the City is an issue currently subject to a partnership approach, particularly where multiple rough sleepers use the same location as a place to sleep and store personal possessions, bedding, or indeed shelters. Where reports are received of Anti-social or criminal behaviour, Police will work in collaboration with CoL services and commissioned outreach to agree a proportionate and welfare based approach, whilst ensuring that where necessary criminals acts and ASB are dealt with appropriately. The City Community MARAC (CCM) is used to co-ordinate and agree an approach.

Formation of a Joint Working Group (CoLP/CoL and partners)

The City of London Joint Working Group (Rough Sleepers / Tented encampments) (CoLJWG) consists of individuals representing statutory partners and other organisations, or people that are well placed to make a valuable contribution to reduce Harm, ASB, crime and disorder within the City of London.

Objectives

- Work in partnership to make the city a safe place to live, work and visit, for everyone.
- Provide a forum, specific to rough sleeping and tented encampments that embeds a partnership approach focused on prevention and sustainable solutions in order to minimise harm, ASB, crime and disorder.
- Reduce demand on service providers and partners.
- Support those who are providing advice, support to rough sleepers with the aim of moving them into suitable accommodation.
- CoLJWG will seek to identify and implement best practise and learning from other areas to ensure innovative and modern ways of working are considered and where appropriate implemented to reduce the negative effects of rough sleeping.
- Ability to respond appropriately and promptly as a multi-disciplinary team, to any incident of risk, emerging threat or rise in demand.

First meeting was yesterday, very positive, key actions were set around safety within encampments and a specific public health issue.

City of London Corporation Committee Report

Committee: Homelessness and Rough Sleeping Sub-Committee	Dated: 03/02/2025
Subject: Severe Weather Emergency Protocol (SWEP) Update Report February 2025	Public report: For Information
This proposal: <ul style="list-style-type: none"> • provides statutory duties 	
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of:	Judith Finlay, Executive Director of Community and Children’s Services
Report author:	Rowan Wyllie, Rough Sleeping Co-ordinator

Summary

This report presents a mid-season update and the context for the City of London’s (CoL’s) provision and outcomes in relation to its Severe Weather Emergency Protocol (SWEP) 2024/2025. A fuller end of season report will come to the spring Sub-Committee meeting.

So far, SWEP has been activated twice in the current winter period. The first activation in November 2024 was for two days; for the second activation in January 2025, it was active for 11 days in total. Across the two activations, 68 unique individuals have accepted and come into SWEP accommodation after this being offered by City Outreach.

Last year, 64 people accepted SWEP accommodation across the entire 18 days of activation. The current 2024/2025 winter period has already surpassed that demand.

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

- Priority 1 – Rapid, effective and tailored interventions
- Priority 3 – Achieving our goals through better collaboration and partnership.

Recommendation

Members are asked to:

- Note the report.

Main Report

Background

1. SWEP aims to prevent loss of life during periods of extreme and freezing weather in the CoL. SWEP is both a local protocol, with CoL-specific guidance and procedures; it is also a Greater London Authority (GLA) protocol. This is reflected in two main ways:
 - **SWEP accommodation:** GLA has Pan-London SWEP provision, though local authorities will also provide their own local accommodation. The expectation is that, under normal circumstances, local authorities will exhaust their own accommodation before using the GLA Pan-London offer, though there are exceptions based on clients' needs.
 - **SWEP activation:** The GLA will activate SWEP when any part of the capital is forecast to be 0 degrees or lower overnight. CoL can activate its own SWEP protocol independent of GLA activation, but the scenarios where this would occur are rare.
2. Once SWEP has been activated by the GLA and CoL officers, the Thames Reach City Outreach team target all individuals currently bedding down in the CoL and offer SWEP accommodation placements. (See Appendix 1: London SWEP Guidance 2024–2025).

Current Position

Activation

3. SWEP has been activated twice this winter period so far:

19 November 2024 to 21 November 2024 (2 days)

2 January 2025 to 13 January 2025 (11 days)

4. The following chart shows the activity across the two SWEP activations so far:

SWEP period	Activation	Deactivation	Total clients offered SWEP (accumulative)	Total clients that Outreach attempted contact with to offer SWEP	Total spaces used	Total accepted and booked into SWEP
1	19/11/2024	21/11/2024	88	105	42	40
2	02/01/2025	13/01/2025	94	183	35	34

Total (duplicates removed)	68
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As the chart shows, 68 unique individuals have accepted an offer of SWEP from CoL commissioned services across the two activations. This is an increase from the total last year, where 64 clients accepted SWEP across the 18 total days of activation. Therefore, this winter period has already had more demand than the previous winter in 2023/2024, with fewer activations so far.

Provision

5. The local SWEP accommodation provision available for City Outreach consists of a range of different accommodation projects within the CoL Pathway. This provides a varied set of offers for frontline services to deliver a person-centred approach and appropriate placement.

6. A total of 30 local SWEP placements offers are available:

Space in communal spaces of accommodation projects: 13

- Grange Road: 6
- Snow Hill Court: 3
- The Lodge: 2
- Crimscott Street: 2

Hotel bookings (Travelodge): 17

7. The Outreach team can refer to Pan-London provision once the local provision is exhausted. This Pan-London provision consists of self-contained hotel spaces. This resource is managed by the Ministry of Housing, Communities & Local Government.

8. If CoL reaches the local capacity and Pan-London is full, the provision is reviewed daily, with escalation to team service managers and the head of service as budget holder.

Operational Process

9. Once placed into SWEP accommodation, their supporting workers aim to engage individuals and create a Credible Service Offer and a prioritised move-on plan that reflects their eligibility and needs. Operational management of case progression is provided by CoL officers to uphold the 'In for Good' principle whenever possible.

10. The 'In for Good' principle dictates that local authorities operating under the GLA SWEP protocol should aim to retain all clients placed into accommodation during SWEP periods until there is a support plan in place to end their rough sleeping.

This has since been revised by the GLA (Appendix 1, section 5) to recognise that:

“Local authorities are facing unprecedented challenges that mean it may not be possible to apply In for Good in practice for every person accommodated during SWEP this winter”

Instead, local authorities are encourage to maximise the impact of SWEP and use opportunities to engage, assess and identify longer-term solutions for all of those who accept. CoL has upheld this methodology, with internal oversight and supervision of case management throughout activations.

11. Key Data

Last year, the average acceptance rate was 40.76%. This year we have measured a 45% acceptance rate in activation 1, and 35% in activation 2, showing a similar average of 40% overall.

Move on outcomes from SWEP:

<p>Activation 1 19 November 2024 to 21 November 2024</p>	<p><u>42 SWEP bookings:</u></p> <p>11 closed (9 abandoned, 2 evicted)</p> <p>12 retained (9 temporary accommodation, 2 hotel extension, vulnerable, 1 hospital stay)</p> <p>19 end of stay, booking closed</p>
<p>Activation 2 2 January 2025 –to 13 January 2025</p>	<p><u>34 SWEP bookings:</u></p> <p>7 closed (6 abandoned, 1 eviction)</p> <p>14 retained (4 temporary accommodation, 2 Snow Hill Court, 6 hotel extension, vulnerable, 2 pathway)</p> <p>1 reconnection</p> <p>12 end of stay, booking closed</p>

Corporate & Strategic Implications

12. Financial implications – N/A

13. Resource implications – N/A
14. Legal implications – N/A
15. Risk implications – N/A
16. Equalities implications – N/A
17. Climate implications – N/A
18. Security implications – N/A

Conclusion

19. SWEP activations for 2024/2025 so far have supported high demand, and the average acceptance rate across the two activations is similar in comparison to the 2023/2024 figure of 40%.
20. SWEP capacity in local provision has increased with the support of Snow Hill Court being able to host three individuals. This is one more person than the previous year. The total capacity for local provision is 30 people.
21. A final SWEP report will be submitted to the Sub-Committee during the 2025/2026 financial year, with full analysis of the protocol and delivery of SWEP 2024/2025.

Appendices

- Appendix 1 – London SWEP Guidance 2024–2025

Rowan Wyllie (she/her)

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Appendix 1 – Guidance for winter Severe Weather Emergency Protocol (SWEP) in Greater London 2024–25 *(Issued November 2024, version 1)*

This guidance is produced by the Greater London Authority (GLA) and London Councils for London local authority rough sleeping lead officers, resilience leads, and their colleagues involved in the provision of services for people sleeping rough in the capital.

This guidance should be read in conjunction with the Homeless Link [SWEP and Winter Provision Toolkit 2024](#), which provides advice on severe winter weather provision for local authorities nationwide.

1. Background

The Severe Weather Emergency Protocol (SWEP) is an emergency humanitarian response to severe weather conditions, the primary aim of which is to preserve life.

Since winter 2017–18, the GLA has provided guidance for London’s local authorities regarding local SWEP plans. In a change to previous years, the 2024–25 guidance has been jointly developed by the GLA and London Councils.

This guidance has been agreed by the Life Off The Streets group, representing all 33 London local authorities. It includes a trigger point for London's SWEP activation of 0°C on any one night to ensure consistency across the capital.

Each borough and sub-region is expected to make its own local SWEP provisions for those sleeping rough in the area. The capacity of local provision should adequately meet local need, informed by the assessment of need undertaken at the borough level.

In addition, the GLA funds some pan-London SWEP ‘overflow’ provision, which is accessible by London boroughs when all options for local SWEP provision have been exhausted.

2. Terminology

- **SWEP** is Severe Weather Emergency Protocol.
- **Activation** is the opening of SWEP to new referrals.
- **Deactivation** is the closing of SWEP to new referrals.
- **Pan-London activation** is the centrally co-ordinated activation of SWEP by the GLA and London Councils across all London boroughs.
- **Overflow provision** is GLA-funded SWEP provision accessible by London boroughs when local provision reaches capacity.
- **‘In for Good’** is the principle where, once a person is supported to access shelter or accommodation, a borough or service will aim to take all steps to ensure that an offer is in place before the person is asked to leave. This would ideally be an offer of ongoing accommodation, reconnection, or assessment of needs to move away from the streets.

3. Guidance on borough SWEP provision

The jointly agreed protocol requires that all London local authorities adhere to the following minimum standards for SWEP:

- SWEP will be activated for the whole of London when any part of the capital is forecast to be 0°C or lower overnight. The GLA and London Councils will co-ordinate this pan-London activation of SWEP.
- The capacity of local SWEP provision should match the anticipated level of need in the area.
- Local authorities should ensure that local SWEP options can always be easily accessed, including out of hours, by all outreach teams and other services coming into contact with people sleeping rough while operating in their borough.
- While SWEP may be provided in a variety of settings, each local authority should ensure that their accommodation can be easily reached from across the borough or that transport is provided where the location necessitates this.
- Local authorities will endeavour to implement the 'In for Good' principle.

Local authorities should ensure that, where local SWEP provision is available, these beds can be easily and swiftly accessed at all times by outreach teams, including by the Rapid Response team in areas where that service operates. Boroughs are encouraged to thoroughly 'road test' their systems for accessing local SWEP provision (including out of hours) to ensure that it can be easily accessed by Outreach.

Local authorities are encouraged to adapt SWEP provisions to meet the diverse needs of people sleeping rough in their borough. This may involve signposting to support for health-related issues, such as mental health and substance misuse, where needed. Additionally, SWEP spaces should be tailored for individuals with heightened vulnerabilities, or those facing barriers to accessing standard SWEP accommodation.

Examples could include:

- women-only bed spaces
- bed spaces for people with high support needs
- Bed spaces for people with dogs
- Bed spaces for couples or groups who may not wish to be separated.

Local authorities should prepare for the need for daytime SWEP provision in the event of exceptionally prolonged or extreme cold weather. For example, this could be done by arranging 24/7 access to shelter, or by working with local partners to extend opening hours or capacity in local day centres.

SWEP is an emergency response intended to save lives, and as such it is expected that local authorities will work together in that spirit of co-operation and offer accommodation to people who may not ordinarily meet the test of local connection or have recourse to public funds. Specifically, providing shelter should not be considered as accepting a local connection or constitute a relief duty.

4. Pan-London SWEP overflow provision

Where there is capacity within the borough's own emergency provision, it is expected that all those sleeping rough will be accommodated there. This includes any known clients who present risks to themselves or others, or are normally excluded from local pathways.

The GLA funds additional SWEP 'overflow' provision. Once capacity of a given local authority's local SWEP provision has been fully exhausted, GLA overflow will be available for referrals from that council's outreach service.

When SWEP is active, the local authority's SWEP co-ordinator has responsibility for notifying St Mungo's at panlondonswep1@mungos.org, their sub-regional Rough Sleeping Co-ordinator, and the GLA at roughsleepingcommissioning@london.gov.uk when their emergency accommodation is close to capacity. At this point, it is encouraged that the local SWEP co-ordinator checks through the appropriate channels to ensure that all local and sub-regional options have been exhausted, and to confirm whether overflow provision is required. Where possible, notification of anticipated need should be made by midday to allow the overflow provision to be prepared.

Arrangements for access to overflow SWEP will be circulated to local authority Rough Sleeping Leads along with SWEP alerts when SWEP is activated. London Councils and the sub-regional Rough Sleeping Co-ordinators will collate boroughs' information including their key contacts and planned capacity.

Where people have been accepted into overflow provision, the expectation is that local authorities will support people to move into the local SWEP provision of the referring borough the following day, and are encouraged to speak with their sub-regional Rough Sleeping Co-ordinator as required. For all placements in overflow provision, SWEP Co-ordinators should continue providing support until a 'move on' plan is secured.

5. The 'In for Good' principle

The 'In for Good' principle means that, once someone has accessed SWEP accommodation, they are accommodated until an assessment of need has taken place to help end their rough sleeping – regardless of whether the temperature has risen above 0°C.

Data suggests that many boroughs employ this approach to good effect, and for hundreds of people each winter, a SWEP stay helps end their rough sleeping. As of 1 April 2024, 61 per cent of people who had had a SWEP stay recorded on the Combined Homelessness and Information Network (CHAIN) during winter 2023–24 had not returned to rough sleeping.

The 'In for Good' principle aims to minimise the number of people returning to sleeping rough following a SWEP placement. It also ensures that, for anyone who does return to the streets, there is an assessment of need or clear plan in place for how rough sleeping services will support them. The assessment should:

- be based on the person's needs and eligibility
- be used to create a realistic and achievable 'move on' plan
- exhaust all options for non-UK nationals.

The Mayor and London Councils are committed to delivering the 'In for Good' principle. However, it is recognised that local authorities are facing unprecedented challenges that mean it may not be possible to apply the principle in practice for every person accommodated during SWEP this winter. 'In for Good' does not require local authorities to provide indefinite accommodation placements, but councils should still try to use the opportunity to engage, assess and try to identify longer-term solutions for everyone accommodated during SWEP.

6. Public health considerations

The 2024–25 SWEP reflects evolving public health needs, focusing on both severe cold weather health risks and infectious disease transmission in shared communal settings. Evidence suggests that the rough sleeping population remain vulnerable to respiratory infections (e.g. COVID-19, flu) alongside other illnesses. Therefore, single-room accommodation remains the preference to minimise infectious disease transmission.

The GLA's position for its own SWEP provision during winter 2024–25 is that single occupancy accommodation will always be the first preference. This is especially true for those deemed to be clinically vulnerable (see Annex B). When demand for SWEP accommodation exceeds all available single occupancy bed spaces, communal sleeping arrangements will be used. Where possible, mitigation measures will be put in place (see Annex A). This approach may need to be adjusted, should an increase in the prevalence or severity of respiratory infections, or increase in accommodation options, change the balance of risks.

Where possible, the GLA seeks to offer single-room accommodation to the most clinically vulnerable individuals referred to its SWEP provision. This also applies to those who need single-occupancy accommodation for other reasons (see Annex B). The GLA will use communal spaces accommodating up to 25 people, with a range of mitigation measures in place when necessary. Mitigation is unlikely to prevent outbreaks, and therefore two or more symptomatic residents and/or staff should be reported to the [local health protection team](#). These teams can provide further support during suspected outbreaks of acute respiratory illnesses.

This plan for the delivery of the GLA's SWEP provision is not given as guidance to local authorities for their local SWEP arrangements. It is recommended that local authorities consult the relevant Director of Public Health and/or public health team about their plans for use of communal sleeping settings.

Local authorities can also consult the [operating principles for night shelters](#) published by the Department for Levelling Up, Housing & Communities in August 2022. This outlines key principles for maintaining public health in night shelter settings. There is also extensive national guidance at gov.uk on managing COVID-19 and other infectious diseases.

Implementing these measures and SWEP will help protect the health and wellbeing of rough sleepers, minimising risks from both infectious diseases and severe cold weather.

7. Monitoring

Local authorities and their services should make every attempt to record all local SWEP stays on CHAIN. This should include recording of people accommodated each night, and the demographics and support needs of those using the emergency spaces. This will allow councils to monitor use of their own SWEP accommodation and enable a comprehensive evaluation of SWEP provision at a pan-London level, informing future provision, and facilitating further improvements to the protocol in following years. The CHAIN team can provide more information – please contact them at: chain@homelesslink.org.uk.

However, it is recognised that a requirement to record details on CHAIN can sometimes be a barrier to people accessing SWEP. So, while CHAIN recording is strongly encouraged, it is not an absolute requirement.

If you have any questions regarding this document, please contact: roughsleepingcommissioning@london.gov.uk.

Annex A: Respiratory illness mitigation measures for communal sleeping (≤25 people) in Greater London Authority (GLA) Severe Weather Emergency Protocol (SWEP) provision

Mitigation measures

- Those sharing the provision should be made aware of the potential infection risk.
- Shared accommodation should, wherever possible, not be used for those who are clinically vulnerable and/or have other vulnerabilities, including age.
- Changes (throughput) in those sharing a room should be minimised.
- It is important to assess residents who are showing respiratory symptoms and adhere to the [latest guidance](#). This winter, [free rapid lateral flow device \(LFD\) tests](#) will be available from local pharmacies for symptomatic residents [eligible for COVID-19 treatment](#). These residents are highly likely to be clinically vulnerable (see Annex B) and ideally prioritised for single-room accommodation.
- A thorough health screening, including vaccination status, would be part of the initial assessment, with access to vaccines offered for all those who are eligible.
- Staff with COVID-19 symptoms should follow NHS guidance on COVID-19 and flu.
- A range of Infection Prevention and Control (IPC) strategies should be considered. Examples include handwashing, ensuring proper ventilation, limiting close contact – especially with those who have respiratory symptoms or are unvaccinated – and wearing masks in crowded indoor spaces.
- Enhanced environmental cleaning should be implemented.
- There should be a means to contact trace individuals when they move on.
- Opportunities to promote vaccination and GP registration should be maximised.

Further information is available via the latest guidance on managing [outbreaks in higher risk communal accommodation settings](#).

Annex B: Clinically vulnerable criteria for Greater London Authority (GLA) Severe Weather Emergency Protocol (SWEP) provision

The following list sets out factors that can make an individual more susceptible to respiratory illness. Clinical vulnerability should be considered as part of a holistic assessment alongside other vulnerabilities, including age and pregnancy. The older the individual, the more at risk they will be.

Individuals may be at highest risk of getting seriously ill from COVID-19 and flu if they have:

- a learning disability (e.g. Down's syndrome)
- a condition that affects the brain or nerves (e.g. Parkinson's disease, multiple sclerosis, cerebral palsy, cerebrospinal fluid leaks)
- autoimmune problems or inflammatory conditions (e.g. rheumatoid arthritis, inflammatory bowel disease, inflammatory arthritis, Addison's disease)

- certain types of cancer, or who have had treatment for certain types of cancer (such as a blood cancer such as leukaemia or lymphoma)
- Sickle cell disease
- certain conditions affecting the blood
- a kidney disease (on dialysis/transplant list/letter from doctor confirming severe kidney problem)
- severe liver disease (e.g. cirrhosis) or chronic kidney disease (e.g. requires dialysis)
- heart or lung problem (e.g. chronic obstructive pulmonary disease (COPD), cystic fibrosis, severe asthma, coronary heart disease or heart failure)
- weakened immune system from:
 - infection (e.g. poorly controlled HIV)
 - history of transplant (organ or stem cell)
 - genetic condition
 - medication (e.g. steroids, drugs for arthritis, 'biologics' in the last 12 months)
 - damage to the spleen (e.g. spleen removal or sickle cell disease).

For clients with the above conditions, finding self-contained accommodation should be a priority. However, a client with one of the above conditions should not be excluded from a shared communal space when self-contained accommodation is not available and therefore the alternative is to return to the street.

These conditions will increase a person's susceptibility to infections all year round. However, during the autumn and winter months when respiratory pathogens (e.g. flu, COVID-19) are circulating, people with these conditions will be particularly vulnerable and are more likely to become seriously unwell. **Therefore, during the flu season (e.g. October–March), or during pandemics, when there is increased risk of transmission, every effort should be made to find self-contained accommodation.**

When shared communal space is the only option, **the individual should be informed of the potential risk of airborne infections**, and steps should be taken to reduce the risk of infections spreading in the environment. For example:

- Let fresh air in by opening vents, doors and windows. Good ventilation will help to clear airborne microbes that are released when infectious people cough or sneeze.
- Staff, volunteers and service users with symptoms (e.g. high temperature) should avoid contact with others to reduce the risk of transmitting infections.
- Good hand hygiene among staff, volunteers and service users.
- Enhanced environmental cleaning.

More information can be found on the GOV.UK website: [Operating principles for night shelters - GOV.UK](#).



MAYOR OF LONDON

City of London Corporation Committee Report

Committee(s): Homelessness and Rough Sleeping – For Information	Dated: 03/02/2025
Subject: An overview of arrangements to Support and Safeguard Adults with Care and Support needs who are Rough Sleeping or Homeless	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties 	Providing Excellent Services Care Act 2015, Mental Capacity Act 2005, Mental Health Act 1983
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of:	Judith Finlay
Report author:	Ian Tweedie

Summary

A report has been completed (Appendix 1) to provide an overview from an Adult Social Care perspective of the work being done in the City of London (CoL) to safeguard adults with care and support needs who are experiencing Rough Sleeping and Homelessness. It specifically focusses on those areas where Adult Social Care (ASC) interfaces with the Homelessness and Rough Sleeping service (HRS).

The report demonstrates that ASC and the HRS service have developed structures, systems and practices designed to support closer working in managing risk and safeguarding adults who are homeless and who rough sleep. Care Act needs assessments are carried out by the HRS social worker, with 52% leading to support being put in place. There are multi-agency high-risk panels in place to monitor and safeguard adults who are rough sleeping. An ASC Quality Assurance Framework is in place complete with an annual audit schedule across all ASC with a specific audit on homelessness and rough sleeping practice scheduled for later this year which will be reported to Members.

Recommendation(s)

Members are asked to: Note the report.

Main Report

Background

1. The City of London (CoL) has duties and powers regarding the assessment, support and safeguarding of adults with care and support needs under the Care Act 2014. CoL has additional and related duties and powers under both the Mental Capacity Act 2005 and the Mental Health Act 1983. Applying this legislation to the homeless and rough sleeping population brings with it a complexity that necessitates close working between the HRS service and the ASC service.
2. The Care Act requires every Local Authority to establish a Safeguarding Adults Board (SAB) for its area. The City and Hackney SAB operates at a strategic level, helping and protecting adults in its area who are at risk of, or experiencing abuse and neglect by assuring itself of the multi-agency safeguarding arrangements and practices within the local authority area. The SAB has a specific City of London sub-committee attended by heads or service from ASC and HRS.

Current Position

3. Both the Homelessness and Rough Sleeping service and the Adult Social Care service sit with the People Directorate of the Department of Community and Children's services. The Heads of each service work together as part to the People's Senior Management team led by Assistant Director Chris Pelham
4. A specific Social Worker post within the Homelessness and Rough Sleeping service which is joint funded with Adult Social Care has been in place since 2021. While embedded within HRS the post has professional supervision and management support from ASC for statutory casework.
5. As a Local Authority the City of London has a duty to undertake an assessment, under the Care Act 2014, where an adult has the appearance of care and support needs. However, this does not apply if the adult refuses the assessment.
6. The HRS social worker undertakes the majority of assessments for adults who are homeless or rough sleeping. There are a number of challenges in assessing the needs of rough sleepers, including refusal to engage and being unable to locate the individual, Approximately 52% of all assessments led to support being put in place. The number of assessments per year has fallen from a high of 20 in 2021/22 to 11 in 2024/25. The impact of the pandemic and the temporary accommodation at Carter Lane may have accounted for the high figure in 2021/22. The more recent figures may have been impacted by the changes in the assessment centre, its systems, locations, and personnel. Other factors may include changes in the rough sleeping cohort with the more transient adults

already connected with and assessed by other local authorities, or for whom social care is not a primary need.

7. The Adult Social Care service provides long term support to adults with care and support needs who have experienced homelessness and rough sleeping. There are currently 20 adults from this cohort in supported living placements, accounting for 50% of all ASC supported living placements. There are an additional 10 adults from this cohort in residential care accounting for approximately 38% of all residential care placements.
8. An average of 10 formal Safeguarding Concerns are raised to ASC each year regarding adults who were rough sleeping or homeless, with approximately 40% leading to Safeguarding Enquiries. Self-neglect is the most prevalent type of abuse in the Safeguarding Enquiries.
9. Prevention is a key principle of adult safeguarding following the premise that it is better to prevent harm before it occurs. Approximately 50% of the HRS Social Worker caseload is aimed at engaging through a preventative lens with those who may not meet the criteria for ASC support. In addition, HRS and ASC have joint funded a strengths-based practitioner role which has led to consistent engagement with 13 adults to prevent a return to rough sleeping by supporting them to manage their health, money, living space, time, and safety.
10. Multi-Agency Risk Panels are based on the principle that shared ownership and decision making is the most effective, transparent and safe way to manage risk in complex or high-risk situations. There are several relevant high-risk panels operating within the city, each with their own specific purpose.
11. There is a Quality Assurance Framework in place across all Adult Social Care practice. The audit schedule includes a specific HRS audit every 2 years, the next will be later this year and the findings of the audit will be reported to members.

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.

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

12. Work to support and safeguard adults with care and support needs who are rough sleeping or homeless is a challenging and complex area of work. There are systems in place which foster close working between HRA and ASC in managing risk and there is evidence of adults being supported through appropriate pathways. There are systems for oversight and quality assurance in place to monitor and improve services.

Appendices

Appendix 1 – An overview of arrangements s Safeguard Adults with Care and Support needs who are Rough Sleeping or Homeless in the City of London

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City of London Corporation Committee Report

Committee: Homelessness and Rough Sleeping Sub-Committee	Dated: 03/02/2025
Subject: Annual Rough Sleeping Snapshot 2024 Report	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes 	Diverse Engagement Communities Proving Excellent Services
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of:	Judith Finlay, Executive Director of Community and Children’s Services
Report author:	Kirsty Lowe, Rough Sleeping Services Manager

Summary

This report presents a local data analysis of the 2024 Rough Sleeping Snapshot that took place from midnight on 19 November 2024 to 04:00am on 20 November 2024. The City of London (CoL) final annual street count figure was 86. This number is made up of those seen bedded down on the night, people who were accommodated the same day through Severe Weather Emergency Protocol (SWEP) and additional names put forward by partners in the follow-up estimate meeting.

The snapshot figure for 2023 was 61, which is a 41% increase on the 61 individuals seen on the snapshot count in 2023. This report provides an overview of previous snapshot counts and the overall upward trend from previous years.

All local authority snapshot intelligence remains embargoed, and so comparative data is limited.

City of London Corporation Committee Report

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. Since 2010 all local authorities in England have been required to conduct an annual Rough Sleeping Snapshot in the autumn months. This snapshot is a recording of a single night figure of people rough sleeping in each authority area. All local authorities must conduct their Rough Sleeping Snapshot between 1 October and 30 November each year.
2. The purpose of a Rough Sleeping Snapshot in a local authority area is to:
 - estimate the number of people sleeping rough on a single night in autumn
 - assess changes in the number of people sleeping rough over time
 - compare local authorities and regions in England
 - understand some basic characteristics about people who sleep rough.
3. For the purposes of a Rough Sleeping Snapshot, the official definition of ‘people sleeping rough’ is:

‘People sleeping, about to bed down (sitting on/in or standing next to their bedding) or bedded down in the open air (such as on the streets, in tents, doorways, parks, bus shelters or encampments). People in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations, or ‘bashes’ which are makeshift shelters, often comprised of cardboard boxes). The definition does not include people in hostels or shelters, people in campsites or other sites used for recreational purposes or organised protest, squatters or travellers.

Bedded down is taken to mean either lying down or sleeping.

About to bed down includes those who are sitting in/on or near a sleeping bag or other bedding¹

¹ Combined Homelessness Information Network (CHAIN)

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A Rough Sleeping Snapshot is conducted by local authorities in conjunction with local commissioned and non-commissioned services, such as outreach teams, police, health services, faith sector representatives, and voluntary services. There are three different types of approaches and methods which can be taken to conduct a snapshot:

- **A count-based estimate:** A physical counting of individual rough sleepers in an area. This is conducted after midnight on the chosen day.
- **An evidence-based estimate meeting:** Evidence of rough sleeping is presented by the local authorities and rough sleeping services, and a list is submitted of rough sleepers who are likely to be out on the chosen given night.
- **An evidence-based estimate meeting including a spotlight count:** This is the same as above, but combined with a 'spotlight' count, which is a physical count also conducted after midnight, though it may not be as extensive.

Local authorities choose which approach to take and are advised to choose an approach that will most accurately provide an on-the-night rough sleeping estimate for their area.

Current Position

4. The CoL Rough Sleeping Snapshot took place on the evening of Tuesday 19 November 2024 and carried on into the early hours of Wednesday 20 November 2024.
5. A 'evidence-based estimate meeting including a spotlight count' methodology was used for the 2024 count.
6. Due to temperatures forecast to fall to zero degrees or colder on the morning of 19 November 2024, SWEP was activated. On the day of the scheduled count City officers decided to change the methodology from a count-based estimate to an evidence-based estimate meeting including a spotlight count. The change of methodology ensured that the count would still go ahead, and that there would be sufficient staff to cover the delivery of SWEP on the day and the following morning. Staffing resources were repurposed from the evening of the street count to the day shift and the early morning shift the following day.
7. On the night of 19 November 2024, there were six teams of two people covering each ward, targeting known individuals and sleep sites. Attendees included CoL officers, CoL elected members, City outreach, CoL Police, NHS staff and independent community volunteers.
8. Eight individuals were booked into SWEP prior to the count starting and were including in the overall figure.

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9. A total of 68 individuals were seen bedded down between the hours of 12:00 midnight and 04:00am. Of those, 26 accepted SWEP and were booked into either supported accommodation or a hotel.
10. The graph below shows the CoL Rough Sleeping Snapshot trends from 2017 to 2024.

Year	2017	2018	2019	2020	2021	2022	2023	2024
Street Count	36	67	41	23	20	43	61	86

11. On 27 November 2024, the estimate meeting took place, hosted by City officers and attended by several City partners and a Homeless Link representative who guided the meeting and verified the final count figure.
12. In the estimate meeting, the list was reviewed including individuals seen on the night of the snapshot count and those booked into SWEP on the day. Partners were then invited to present evidence of those that were most likely rough sleeping in the Square Mile that night but weren't seen on the count. Data was scrutinised to ensure that no duplicates were present before the final figure was submitted to Homeless Link.
13. Homeless Link carried out their own checks before confirming the final figure. City officers submit this information to the Ministry of Housing, Communities & Local Government (MHCLG) via the online Delta account.
14. Demographic information of the 86 individuals met on the 2024 count are as follows:

Gender	
Women	2
Men	84
Not known / prefer not to disclose	0
Age	
Under 18 (add further detail below)	0
18–25	3
26 and over	65
Not known / prefer not to disclose	18
Nationality	
UK national	28
EU national (excluding UK)	22
Non-EU national	20
Not known / prefer not to disclose	16

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15. Analysis found that 26 of the 86 individuals were identified as T1000, a cohort of people with complex support needs and/or who are long-term street attached. Of those 26 individuals, 13 were City T1000s and the remaining 13 were T1000s linked to other London boroughs.
16. Further analysis found that 15 of the 86 individuals were known to have no recourse to public funds, 35 did have recourse to public funds, and the situation for the remaining 36 was unknown.
17. Castle Baynard remains the busiest ward on the night, with the highest number of individuals seen rough sleeping at Castle Baynard Street.
18. The City Outreach team have been conducting street audits since the start of the COVID-19 pandemic. These night-time shifts are in place to emulate the process of a physical snapshot count. The aim is to keep a regular record of a snapshot figure, to inform CoL officers and City Outreach of likely 'on the night' figures at a given point during the year.

Street Audit and Snapshot 2024											
Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
75	81	45	45	35	42	40	39	43	31	86	49

19. The table shows street audit figures for 2024 with the November Snapshot figure in bold.
20. As this chart illustrates, street audit and street count numbers are variable. Overall monthly street audit numbers have gradually increased in the winter period and reduced in warmer months.

Corporate & Strategic Implications

21. **Financial implications** – See risk implications below.
22. **Resource implications** – N/A
23. **Legal implications** – N/A
24. **Risk implications** – N/A
25. **Equalities implications** – N/A
26. **Climate implications** – N/A
27. **Security implications** – N/A

Conclusion

28. The CoL saw its highest annual street count figure since records began in 2010. In addition to carrying out the annual street count, officers and partners also provided SWEP due to freezing temperatures and supported a total of 34 individuals into emergency off-the-street accommodation within 24 hours.

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29. On review of the demographic information and support needs of the individuals, a significant proportion of individuals presented with complex support needs: 22% were known T1000 clients, and at least 13% of individuals were known to have no recourse to public funds.

Appendices

- None

Background papers

- Annual Rough Sleeping Snapshot 2023 Report
- Annual Rough Sleeping Snapshot 2022 Report
- Annual Rough Sleeping Snapshot 2021 Report

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City of London Corporation Committee Report

Committee: Homelessness and Rough Sleeping Sub-Committee	Dated: 03/02/2025
Subject: Rough Sleeping Prevention and Recovery Grant 2025/26 Update Report	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes 	Diverse Engagement Communities Proving Excellent Services
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain’s Department?	N/A
Report of:	Judith Finlay, Executive Director of Community and Children’s Services
Report author:	Will Norman, Head of Homelessness Prevention and Rough Sleeping

Summary

This report provides Members with an update on our Rough Sleeping Prevention and Recovery Grant (RSPRG) spending plans for the period 2025/26. This new grant programme replaces the previous Rough Sleeping Initiative (RSI) grant which City of London has received awards from since 2019/20. The Ministry of Housing, Communities & Local Government (MHCLG) confirmed the City of London award of £1,373,509 for 2025/26, which is very similar to the amount awarded in 2024/25 under the RSI grant.

The grant will be paid in the spring of 2025 in a single tranche as a Section 31 ring-fenced payment. The grant will be subject to a single, light-touch mid-year delivery report and an end of year declaration.

City of London Corporation Committee Report

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. In February 2022, City of London officers submitted a 2022–2025 RSI proposal totalling £3,709,566. The core RSI award for 2024/2025 was £1,373,840.
2. The current RSI award, which expires on 31 March 2025, covers 15 projects, posts or funds. Most are funded by the RSI grant. Some interventions are funded by a mix of RSI grant and City Fund, and some are shared with other local authorities from their respective RSI awards. A number of interventions, such as posts, are funded across more than one City of London team/budget area.
3. The new RSPRG covers the financial year (FY) 2025/26. The MHCLG has reduced the emphasis on co-production and moderation of funding proposals in favour of a ring-fenced grant award and has removed individual lines with funding allocations attached. This gives officers greater flexibility in how the grant is used.
4. The RSPRG 2025/26 award of £1,373,590 very closely reflects the RSI award of 2024/25. Increases to employers' National Insurance contributions and sustained inflation means that services are more expensive to commission this year than last year. Contracts funded by the RSI were scheduled to end when grant-confirmed funding expired, so services will need to be recommissioned. The additional cost of (re)commissioning interventions will need to be factored into the spending plans for 2025/26.

Current Position

5. Officers are currently developing spending plans that sustain the most effective elements of the current RSI programme, while also considering new interventions which help equip us to respond to current and near future demand.

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6. Posts held by City of London staff on fixed-term contracts aligned with the RSI have been moved to new 12-month fixed-term contracts. These salary costs, whether wholly or in part, will be met from the Homelessness and Rough Sleeping base budget in 2025/26. The roles are:
 - Homeless Health Coordinator
 - Senior Commissioning Manager
 - Strength Based Practitioner (reporting to the Rough Sleeping Social Worker)
 - Pathway Liaison Officer.
7. Funding for The Lodge and City Lodge residential projects, and small budgets for reflective practice and personalisation will also be moved to the Homelessness and Rough Sleeping budget area. These changes allow space within the 2025/26 funding envelope to address shifting demand and experiment with new interventions.
8. Additional to the City of London RSPRG award, the north-east London sub-region has been awarded £1,323,562. Officers are liaising with the sub-regional co-ordinator and colleagues across neighbouring boroughs to discuss how a portion of this funding can be used in the Square Mile.
9. Members will be updated with a more comprehensive explanation of how the grants have been used at the 14 May 2025 Sub-Committee meeting. The deadline for finalising City of London plans is driven by the pace at which we can complete the necessary procurement processes. Officers are working to deliver new interventions and recommission existing interventions as close to the start of the new financial year as possible.

Corporate & Strategic Implications

10. **Financial implications** – N/A
11. **Resource implications** – N/A
12. **Legal implications** – N/A
13. **Risk implications** – N/A
14. **Equalities implications** – N/A
15. **Climate implications** – N/A
16. **Security implications** – N/A

Conclusion

17. MHCLG has confirmed that City of London will receive £1,373,590 from the new RSPRG for 2025/26. This grant programme has replaced the RSI grant.

City of London Corporation Committee Report

18. The award is very close to that provided through the 2024/25 RSI grant. The grant will be provided in a single tranche in April 2025 with less co-production and moderation than previously associated with the RSI programme.
19. Some salary and project costs will be moved to the Homelessness and Rough Sleeping budget to allow officers to develop and evolve our existing programme of work to address changing demand and service pressures.
20. The north-east London sub-region has been awarded an additional £1,323,562. Officers are liaising with colleagues in the sub-region to discuss the use of these funds in 2025/26.
21. Members will receive a comprehensive description of changes to RSPRG funded service delivery at the 14 May Homelessness and Rough Sleeping Sub-Committee meeting.

Appendices

- None

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

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City of London Corporation Committee Report

Committee: Homelessness and Rough Sleeping Sub-Committee	Dated: 03/02/2025
Subject: Homelessness and Rough Sleeping Strategy 2023–2027 Update Report	Public report: For Information
This proposal: <ul style="list-style-type: none"> • delivers Corporate Plan 2024–2029 outcomes 	Links to Corporate Plan outcomes 1,2,3,4,10
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	NA
What is the source of Funding?	NA
Has this Funding Source been agreed with the Chamberlain’s Department?	NA
Report of:	Judith Finlay – Executive Director, Community and Children’s Services
Report author:	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 Strategy Delivery Plan (SDP). The first part of the report offers members a high-level summary of SDP actions underway and completed. Appendix 4 provides Members with a summary of completed actions to date from the SDP.

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).

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

- Priority 1 – Providing 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 to every Homelessness and Rough Sleeping Sub-Committee meeting.
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 (SDP) Update

	Priority 1 Providing 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	6	5	8	3	22
Complete	4	2	6	3	15
Total	12	10	17	8	47

- There are currently 47 actions on the SDP.
- There are no new actions added in the period to date.
- 38 actions have commenced – the same as in the last period.
- 23 actions are currently live (underway with/without issues) – two fewer than the previous period.
- 15 actions are now completed – two more than the last period.

- No significant risks have been identified at this stage.

3. The actions completed in the period are:

- ✓ Ministry of Housing, Communities & Local Government (MHCLG) Homelessness Advice and Support Team officers undertook a review of our statutory homelessness functions on 21 January 2025. A summary of their findings will be presented to Members at a future meeting (Priority 1).
- ✓ Advisory Groups facilitated by Groundswell and Platform and attended by participants with lived experience are underway on an every two month basis. Co-production champions have been established in our commissioned services to promote the principles of co-production (Priority 3).

Performance Scorecard and Dashboard Commentary

4. The Scorecard and presentation slide Dashboard can be found at Appendices 1 and 2 respectively.

Quarter 3 (Q3) Commentary

This section is designed to be read alongside the Performance Scorecard (Appendix 1).

Priority 1 – Providing rapid, effective and tailored interventions

- 1.1** This is the third successive increase in the number of statutory prevention and relief outcomes. The six recorded in Q3 increases the likelihood that we will match or exceed the number of outcomes for the year.
- 1.2** During the period, 332 individual rough sleepers were reported, a 30% increase on Q2 and the highest quarterly figure so far this year. The trend in rough sleepers recorded during the year continues to match annual City and Greater London data.
- 1.3** This is the third successive quarter that we have recorded a decrease in the number of 'T1000' priority rough sleeping cohort. The 17 recorded in Q3 is four fewer than Q2 and six fewer than Q1. This metric is trending down in 2024/25 in a similar way to 2023/24. Every year a new cohort is assigned to each local authority: 37 was starting figure in 2023/24. After last year's success we began 2024/25 with 23, therefore this year's progress is measured against the starting point of 23.
- 1.4** There were 84 accommodation outcomes achieved in the period. This includes Severe Weather Emergency Protocol (SWEP) placements and there are typically higher values in Q3 and Q4.

Priority 2 – Securing access to suitable, affordable accommodation

2.1 The average length of stay in temporary accommodation increased from 373 days to 452 days in the period. A number of factors are contributing to this rise, both between the last two quarters and Q3 this period and the position in Q3 2023/24 when

the figure was 137 days. Demand on the City of London housing register means that of the 15 bidding cycles in the quarter, only 5 had properties available. The private rented sector remains unaffordable for many applicants resulting in a longer timeframe for officers to safely discharge duties. The numbers of households we have in statutory TA is still relatively low compared to other local authorities, this means a small number of applicants can skew the data quite quickly.

2.2 The number of supported accommodation beds at our disposal remained the same at 89, however, six more temporary accommodation rooms were secured through a block booking. These placements will be supported remotely by the Mobile Intervention Support Team (MIST).

2.3 Three placements into the private rented sector were achieved, all through the Statutory Homelessness team. This is the highest quarterly value so far this FY.

Priority 3 – Achieving our goals through better collaboration and partnership

3.1 There were 12 referrals received through the ‘Duty to Refer’ (S213B of the Housing Act 1996), which equals the highest value recorded on two occasions since Q1 2023/24. This will be driven by demand and communication efforts to drive awareness of the Duty to Refer function.

3.2 The number of individuals sleeping at high-impact rough sleeping sites and encampments (49) increased for the third successive quarter. This is driven by the continued presence of tented encampments at Castle Baynard Street and Peninsular House.

Priority 4 – Providing support beyond accommodation

4.1 There were 21 rough sleepers with an assessed substance misuse need and were referred to a specialist organisation. This is the third consecutive quarter we have seen a decrease in this number. Officers continue to work with commissioned services to ensure that all eligible clients are being directed to treatment options.

4.2 The number of rough sleepers registered with a GP decreased slightly from 27% in Q2 to 24% in Q3 but remains mostly stable for the year to date. A clearer picture is beginning to emerge around the rate at which City rough sleepers are known to be registered. This value is confirmed registrations and does not take into account where the outreach team cannot confirm if someone is registered or not.

4.3 A total of 15 individuals across our rough sleeping and accommodated cohorts accessed some kind of structured employment, training or education offer. This is a decrease on Q2 but fairly consistent with data since Q1 2023/24.

Options

5. There are no options for Members to consider.

Proposals

6. There is no proposal for Members to consider.

Key Data

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

Corporate & Strategic Implications

8. Financial implications – none

9. Resource implications – none

10. Legal implications – none

11. Risk implications – none

12. Equalities implications – none

13. Climate implications – none

14. Security implications – none

Conclusion

15. Two actions on the SDP were completed in the period. This brings the total of completed actions to 15. No new actions were added. A total of 23 further actions remain underway, and nine are yet to commence.

16. Rough sleeping numbers increased in the period after a small drop in Q2. Rough sleeping levels remain higher this year than at the same point last year.

17. The number of rough sleepers found at hotspots and tented encampments rose for the third successive quarter. However, we have seen success in working with long-term and complex needs clients with another decrease in the number of T1000 priority clients recorded rough sleeping.

Appendices

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

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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							
1. Providing rapid, effective and tailored interventions															
1.1. Statutory homelessness is prevented and relieved (Pt7 Housing Act)	7	7	1	2	1	4	6		2	11	11	8	15	19	17
1.2. Reduction in the number of individuals sleeping (R1)	180	190	279	260	298	256	332		76		434	350	372	482	656
1.3. Decrease in City T1000 cohort seen rough sleeping	37	25	18	17	23	21	17		-4						
1.4. Total number of accommodation outcomes	30	24	78	107	41	49	84		35	174	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
2. Securing access to suitable and affordable accommodation															
2.1. Reduction in the average length of statutory temporary accommodation stays (days)*	132	273	137	488	406	373	452		79						
2.2. Increase in the supply of properties available to individuals facing homelessness or are rough sleeping	89	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	4		2	6	7	12	8	8	10
3. Working collaboratively															
3.1. Increase in the number of referrals received under S.213b Duty to Refer	9	12	9	10	12	9	12		3	33	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	49		7						
3.3. Increased satisfaction reported through service user feedback															
4. Support beyond accommodation															
4.1. Individuals with an assessed substance misuse need are referred to a specialist agency	49	54	50	66	35	25	21		-4	81					219
4.2. Increase in the number of rough sleepers registered with a GP	36%	44%	18%	28%	27%	27%	24%		-3%	26%					32%
4.3. Increase in the number of service users accessing education, employment or training	15	17	12	14	18	15	15		0						
4.4. Reduction in the number of people rough sleeping who had previously moved into settled supported accommodation	6	5	6	4	2	3	3		0	8					

HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2023-2027

Department of Community and Children's Services

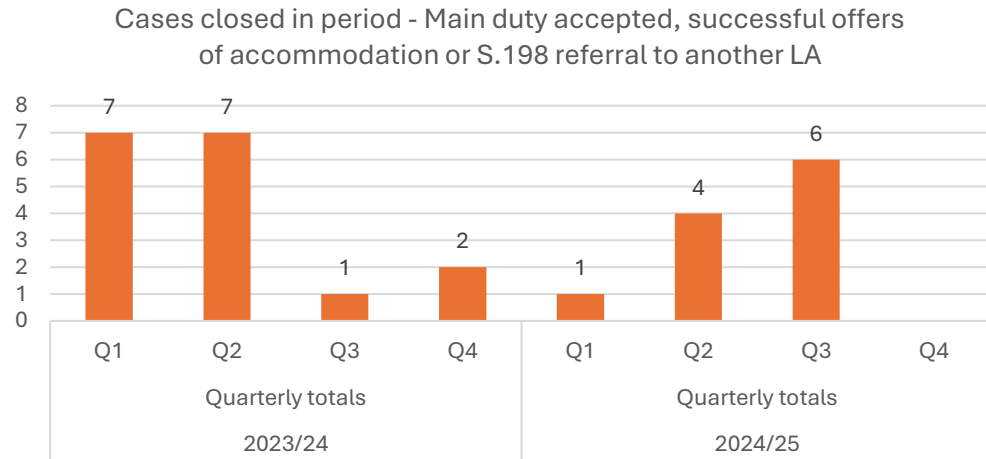


Performance Metrics

Year 2024/25 – Q3

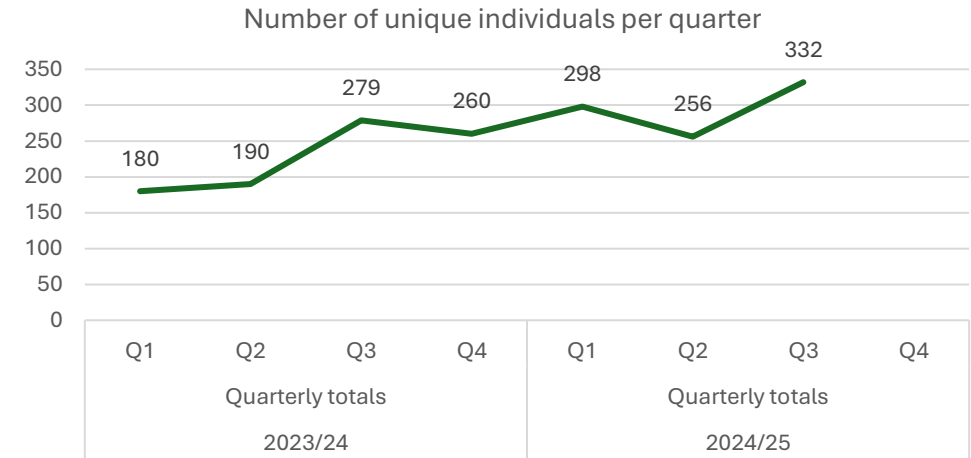
Priority Area 1: Providing rapid, effective and tailored interventions

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



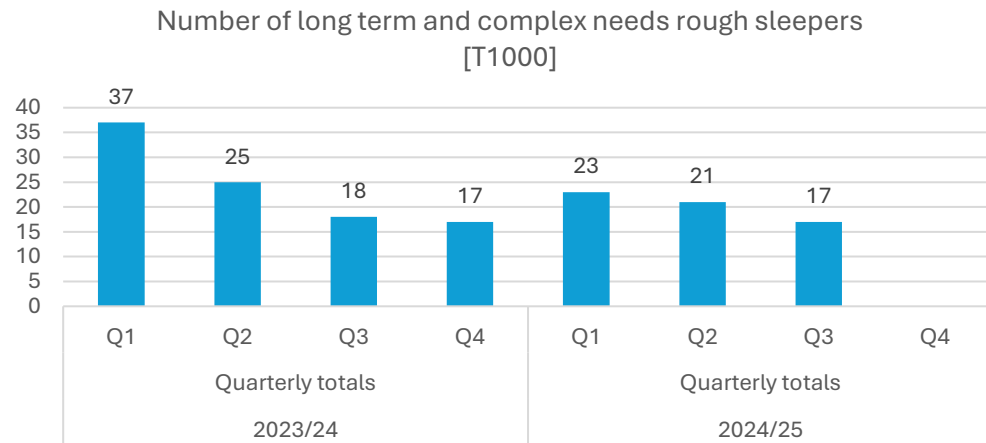
Source: Jigsaw

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



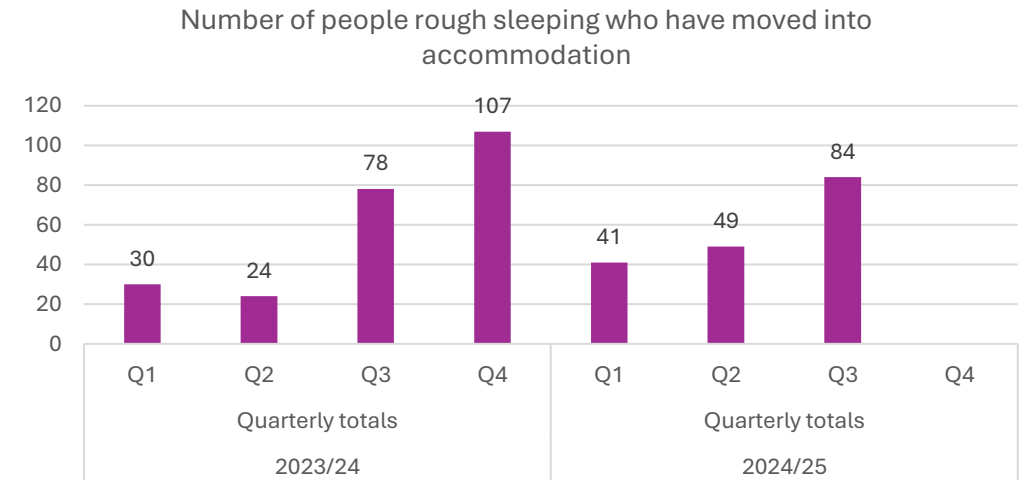
Source: Chain

1.3. Decrease in City T1000 cohort seen rough sleeping



Source: Chain

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

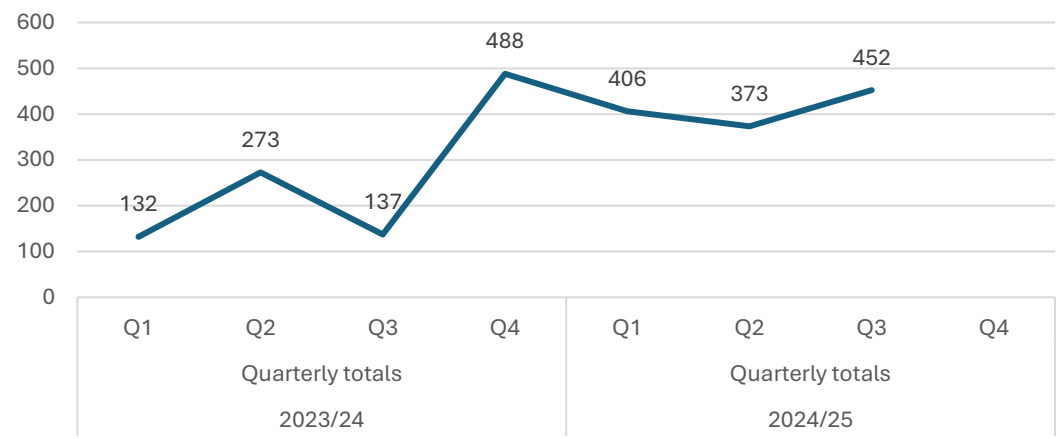


Source: SITRS

Priority Area 2: Securing access to suitable and affordable accommodation

2.1. Reduction in the length of statutory temporary accommodation stays

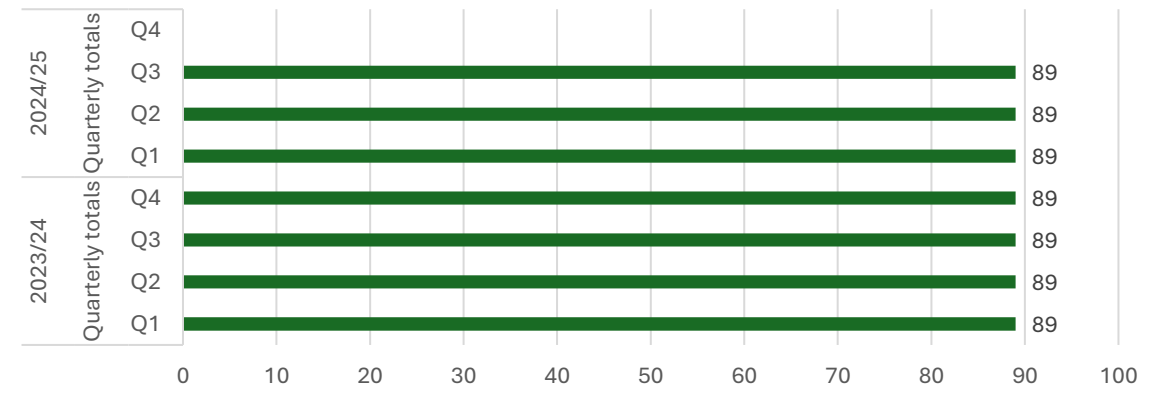
Average length of stay for closed cases in period



Source: Jigsaw

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

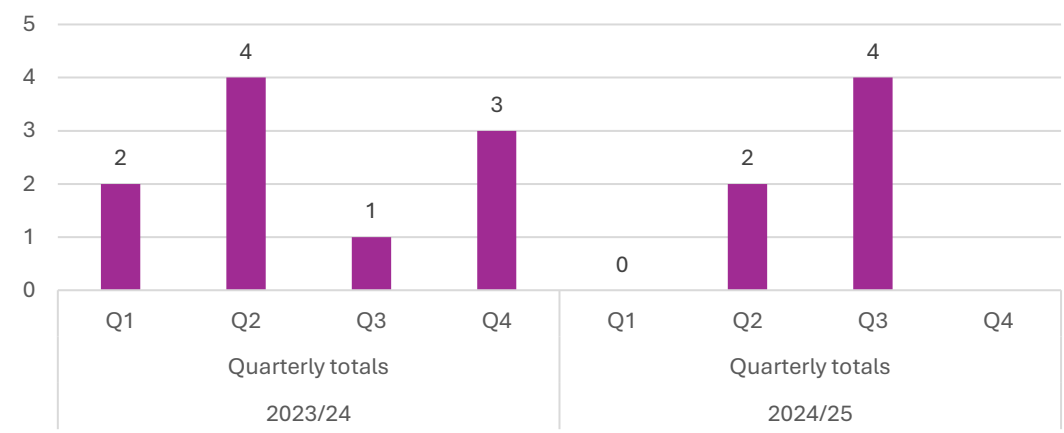
Number of properties available in City of London pathway



Source: RISE

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

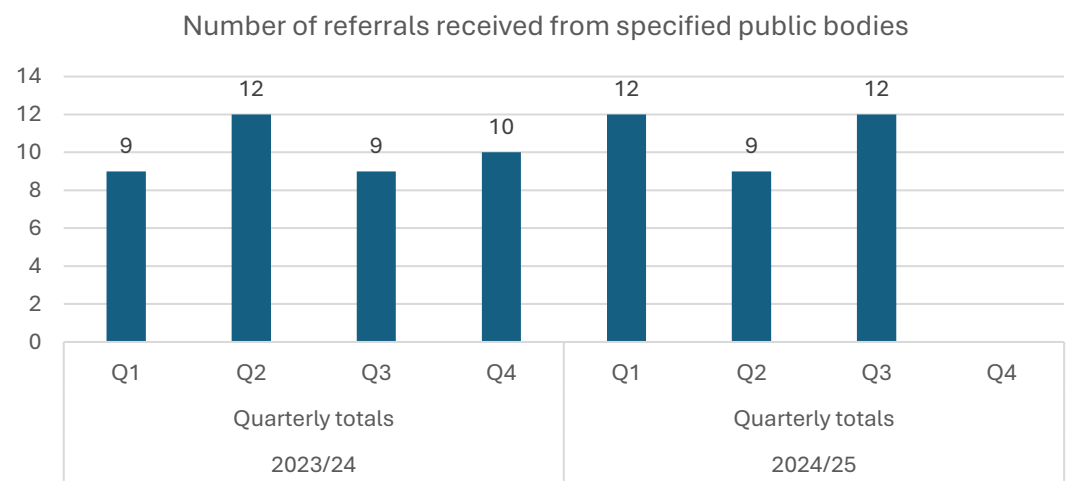
Number of people accessing the private rented sector [statutory homelessness and rough sleepers]



Source: RISE and H-

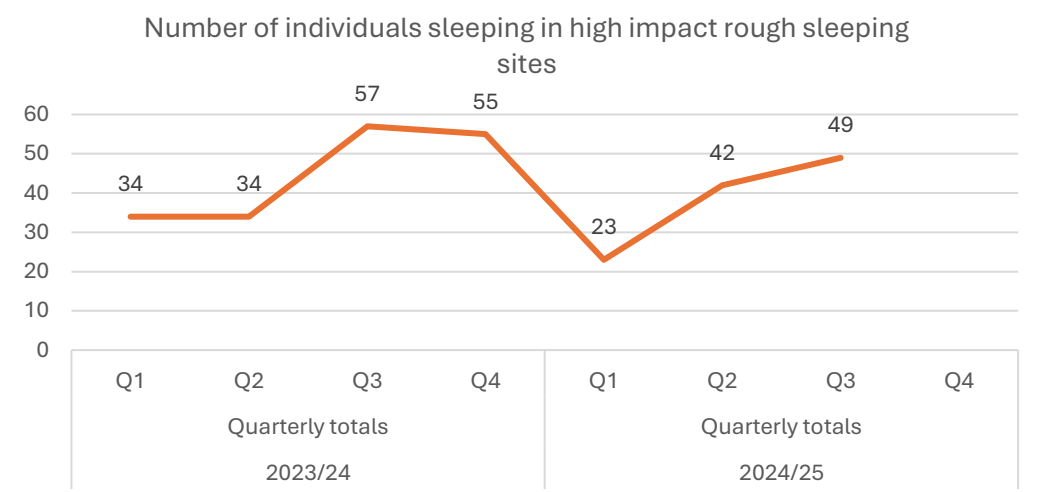
Priority Area 3: Working collaboratively

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



Source: Jigsaw

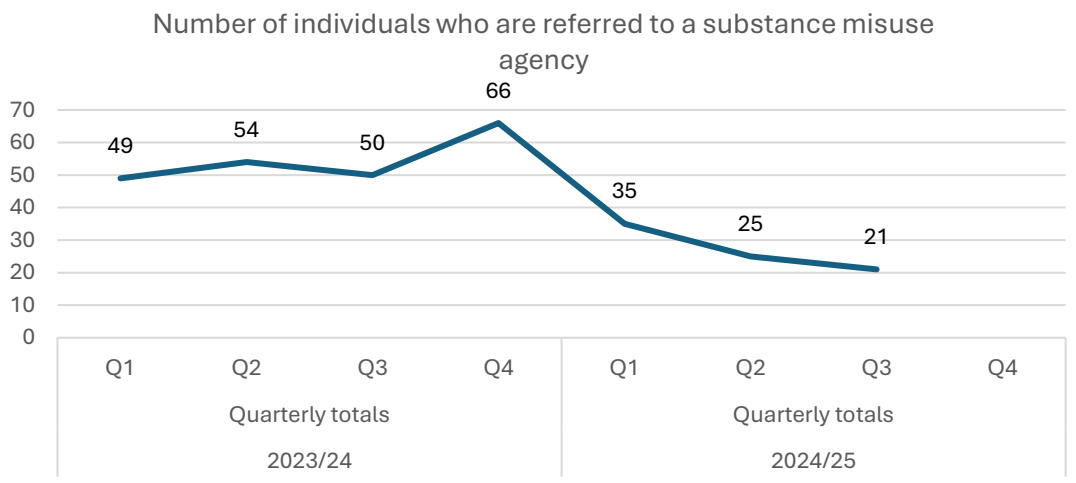
3.2. Reduction in the number of individuals rough sleeping in high impact rough sleeping sites (HIRSS)



Source: Chain

Priority Area 4: Support beyond accommodation

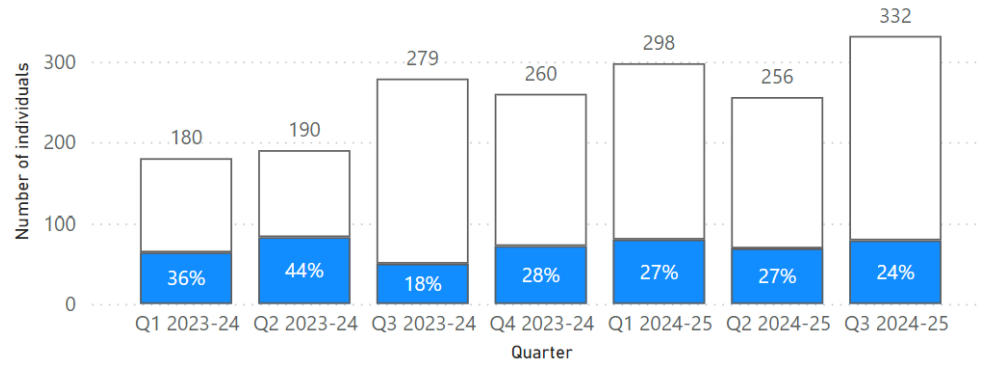
4.1. Individuals with an assessed substance misuse need are referred to a specialist agency



Source: CHAIN, Rise

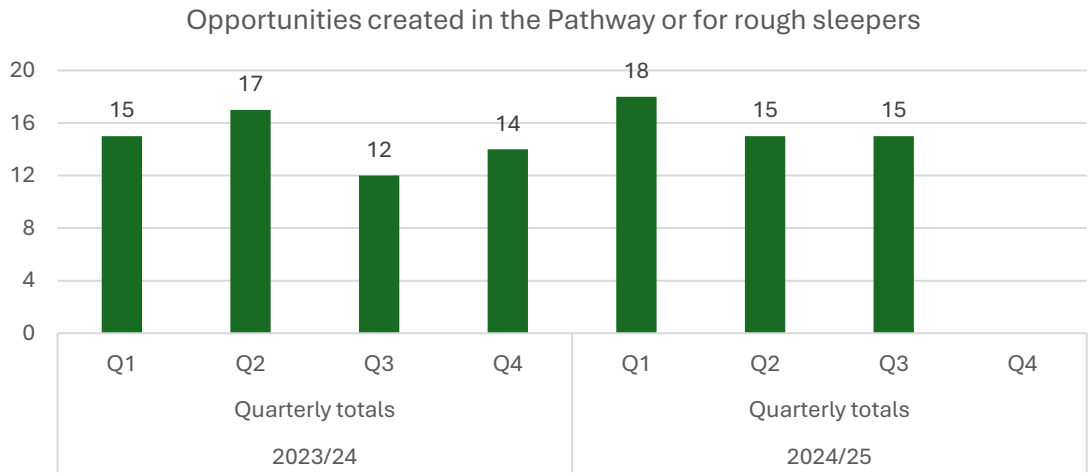
4.2. Increase in the number of rough sleepers registered with a GP

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

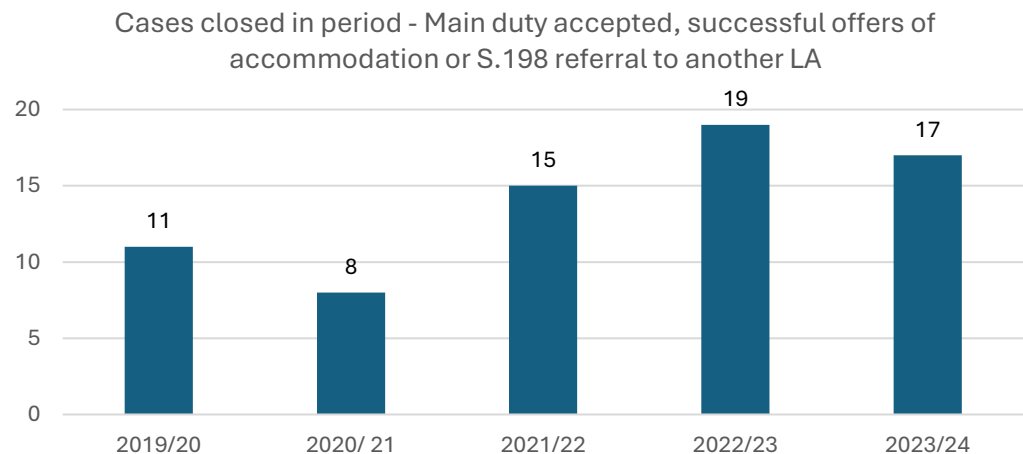


Annual trend data

Year 2019 to 2024

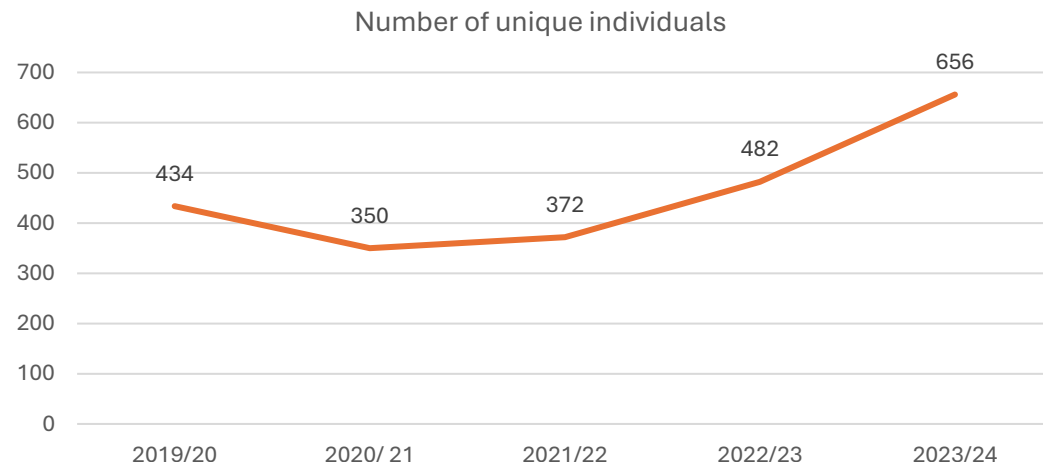
Priority Area 1: Providing rapid, effective and tailored interventions

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



Source: Jigsaw

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



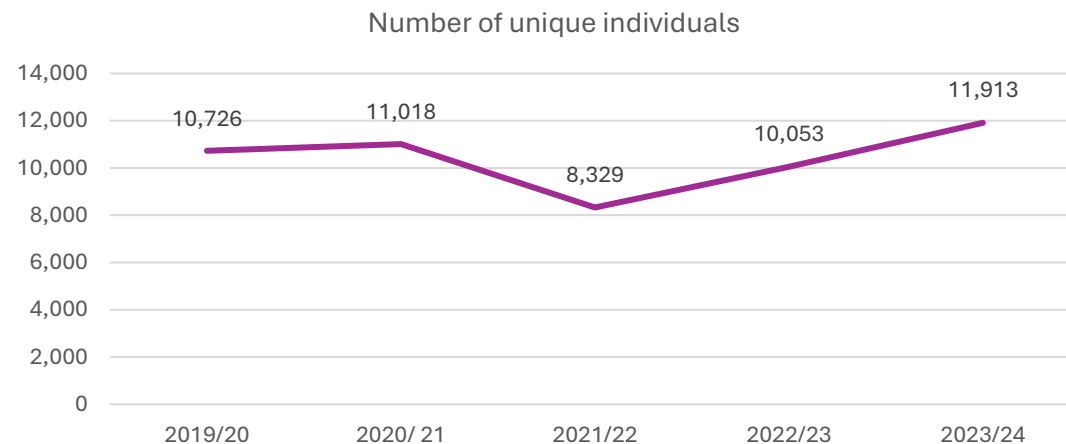
Source: Chain

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



Source: SITRS

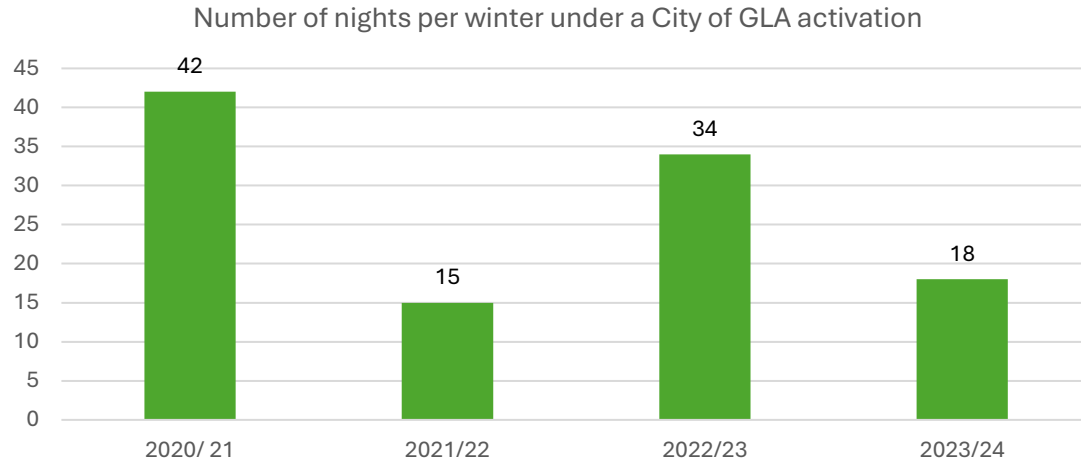
1.5. Annual total of unique individuals seen rough sleeping in Greater London (additional)



Source: Chain

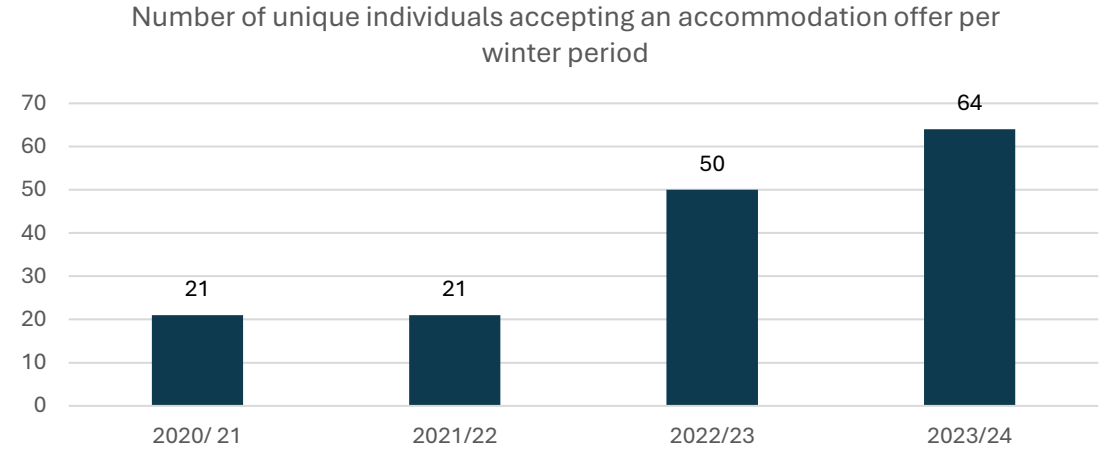
Priority Area 1: Providing rapid, effective and tailored interventions

1.6a. Nights under SWEP activation (additional)



Source: Chain

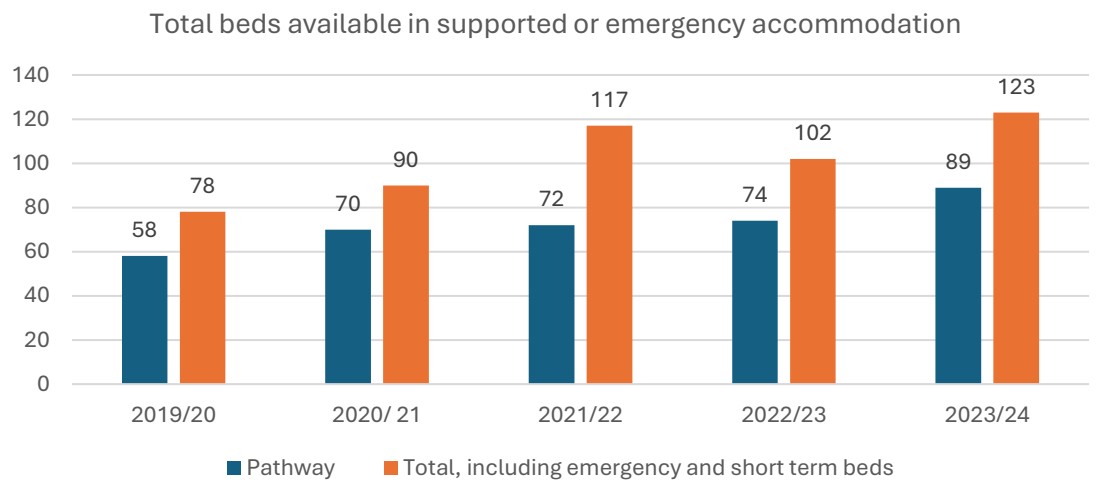
1.6b. Number of individuals accepting SWEP offer (additional)



Source: Chain

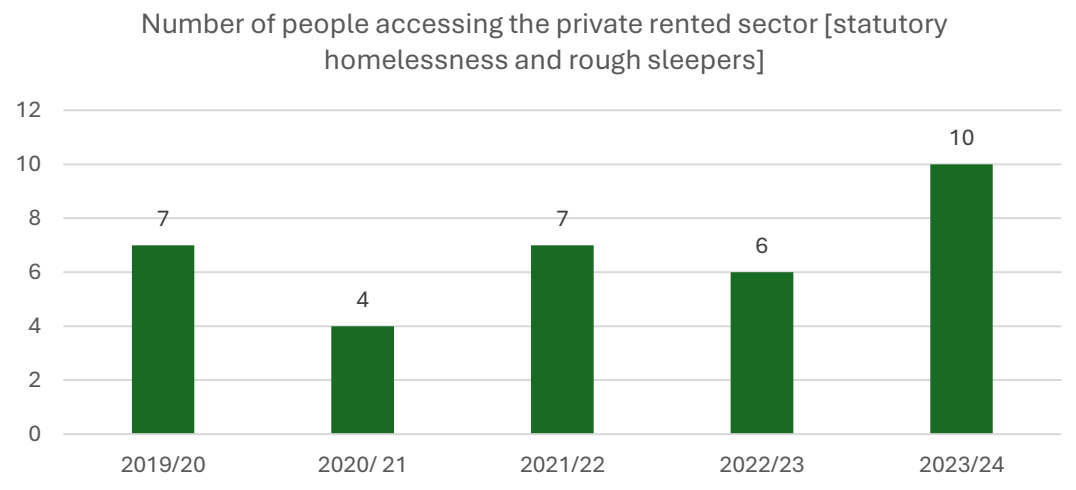
Priority Area 2: Securing access to suitable and affordable accommodation

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

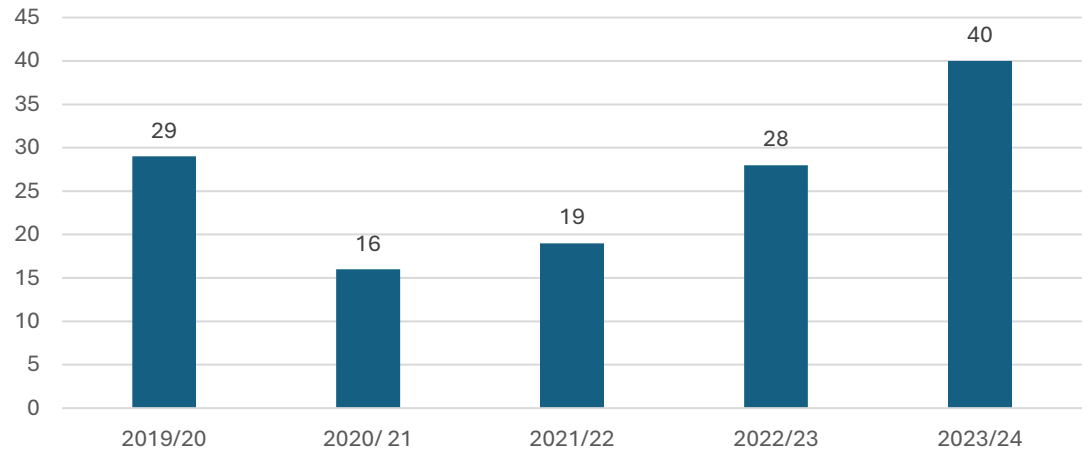


Source: RISE and H-

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

Cross-cutting	3.14	Increase number of peer-led activities	No	HoS	Utilise coproduction workstream to introduce lived experience to activity across service area	RSSM, HHC, NB, CM	30-Apr-25	Coproduction outcomes framework	Better outcomes for service users. More innovation and progression from commissioned services	Complete	<i>Mayday Trust/Groundswell commissioned to deliver coproduction workstream. KPI's confirmed. January 2025 - Advisory Panel and Coproduction Champions roles now in place.</i>
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Statutory Homelessness	1.12	Review statutory processes	Yes	HoS	Commissions independent review of statutory process to test resilience, quality and effectiveness	SHO	31-Mar-25	Review report	Homelessness is prevented and relieved with accuracy and consistency. Staff have the support and resources they need.	Complete	<i>October 24 - review to be carried out by MHCLG HAST advisor by end of FY. December 24 - HAST visit scheduled for 21/1/25. January 2025 - HAST feedback being actioned.</i>
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City of London Corporation Committee Report

<p>Committees: Community and Children’s Services – For Decision Homelessness & Rough Sleeping Sub-Committee – For Information Police Authority Board – For Decision</p>	<p>Dated: 16 January 2025 3 February 2025 12 February 2025</p>
<p>Subject: Policy and protocol to tackle the negative impacts of rough sleeping</p>	<p>Public report: For Information</p>
<p>This proposal:</p> <ul style="list-style-type: none"> • delivers Corporate Plan 2024-29 outcomes • provides statutory duties 	<p>Diverse Engaged Communities: Vibrant Thriving Destination: Providing Excellent Services:</p>
<p>Does this proposal require extra revenue and/or capital spending?</p>	<p>Yes</p>
<p>If so, how much?</p>	<p>£ To be determined</p>
<p>What is the source of Funding?</p>	<p>A funding bid will seek to provide a 6 month pilot</p>
<p>Has this Funding Source been agreed with the Chamberlain’s Department?</p>	<p>Longer term funding will need to be identified</p>
<p>Report of:</p>	<p>Judith Finlay, Executive Director of Community and Children’s Services</p>
<p>Report authors:</p>	<p>Simon Cribbens, Community and Children’s Services Nikki Gander, Chief Inspector, City of London Police</p>

Summary

This report presents a draft policy statement and protocol in support of interventions to tackle the negative impacts such as anti-social behaviour that can be associated with 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. It seeks to ensure there is a transparent, balanced and proportionate approach that ensures continued welfare support, whilst protecting those who sleep rough and the wider community from harms.

It notes, that if approved, the implementation of the approaches set out will require resource to co-ordinate and properly manage them. A bid will be submitted to the Safer City Partnership for grant funding that could support an initial pilot period.

The report is for approval.

Recommendation

Members are asked to:

- Approve the draft policy, protocol
- Note risk and resource implications
- Note the proposed bid for funding to pilot an approach

Main Report

Background

1. The City of London Corporation is committed to supporting those who sleep rough on the Square Mile to 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.¹
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).²
6. Rough sleeping can also be associated with activities like begging, street drinking, substance misuse and other antisocial behaviour. For those who live,

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

² [PowerPoint Presentation \(england.nhs.uk\)](#)

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 aggressive 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 barbeques 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 on Castle Baynard Street. Both have elicited concerns from Members, City businesses and City Corporation Officers, and requests for action to be taken.

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 Baynard House. While this has had a positive impact (including resulting in the acceptance 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 options set out, and that recommended, have been informed by engagement with:

- Thames Reach the specialist homelessness charity (provider of the City Corporation's rough sleeping outreach and assessment centre services)
- Rough Sleeping Specialist Adviser – Ministry of Housing and Local Government
- Homelessness and Rough Sleeping Sub Committee
- Chairman – City of London Police Authority Board

- City of London Police
- Homelessness and Rough Sleeping Strategy Group
- Safer City Partnership
- City of London Corporation services

21. 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.
22. 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.

Option 1: Welfare based//passive approach only

23. 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.
24. A welfare only approach reflects current practice, in which interventions to tackle negative behaviours have only been used when issues have escalated to a significant level.

Option 2: Planned and proactive approach to tackle the negative impacts

25. An approach based on tackling anti-social behaviour or using powers to address obstructions or trespass will necessarily have to be tailored, appropriate 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.
26. If an approach were taken to clear a site because of the scale of negative impact related to it, consideration will need to be given as to how this will be sustained through follow up action or design changes.
27. It is proposed that an agreed policy, and protocol for its use, would provide for planned and proactive approaches to tackle the negative 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.

28. 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.
29. 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

30. Option 2 is recommended.
31. 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.
32. 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.
33. 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.
34. 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.
35. 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 to address the complex challenges linked to homelessness.
36. It recognises that there will be instances where partnership intervention may be required 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/or businesses;
 - the behaviour is impacting upon an agency’s resources and day to day operations; and
 - the behaviour has significant impact on – or could be reasonably expected to negatively impact - vulnerable people.
37. 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.

38. The proposed protocol is found in Appendix 3.
39. The approval of both policy position and protocol will enable officers to act with confidence of political support, while providing Members with reassurance.
40. The City Corporation will always work alongside the City of London Police to deliver any intervention, to ensure it is managed safely.
41. The wording of the policy and protocol may be subject to revision for communications purposes or to reflect changes to operational structures and roles. Changes will not be made to the substance of the policy without the approval of Members.

Risk and Issues

Limitation of offer to those with “no recourse to public funds” (NRPF)

42. The current profile of those engaged sleeping rough in tented encampments suggests the majority are NRPF.
43. 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.
44. 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
45. 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.
46. 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.
47. 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

48. 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.
49. 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.
50. Such displacement could be across local authority boundaries which may create additional demands and challenges to the services in those areas.
51. 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

52. 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 Baynard House location, four new tents have been erected in the area.
53. 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 detrimental 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.
54. 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

55. The use of powers and tools available to local authorities and the police is rightly open to legal challenge.
56. 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.

57. 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.

58. 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 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

59. 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.

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

61. 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.

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

Equalities considerations

63. An Equality Impact Assessment is appended (Appendix 4). Members are asked to consider and have due regard to the equalities impact assessment.

64. 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.

65. 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

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

67. 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. There is no role in place to deliver this function.

68. There will be additional costs association with the delivery of any action – such as translation, specialist advice, storage of belongings and specialist cleansing.
69. 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.
70. Interventions also require the resources of partners such as the City Police, homeless outreach services, the Community Safety Team and Cleansing Services.
71. Should Members approve the proposed approach, officers will bid for funding - to pilot a role and provide supporting budget - to the Safer City Partnership's Proceeds of Crime Act funding pot. The proposal is consistent with the priorities of the partnership's strategy and priorities for funding.

Corporate & Strategic Implications

Strategic implications

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

Financial implications

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

Resource implications

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

Legal implications

75. Noted within the report.

Risk implications

76. Noted within the report

Equalities implications

77. Noted within the report.

Climate implications

78. None

Security implications

79. None

Conclusion

80. 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
- 4 Equality Impact Assessment

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Appendix 1 - Summary of key legal powers

Power	Description	Conditions	Requirements	Outcomes	Pros	Cons	Additional Information
Anti-Social Behaviour, Crime and Policing Act 2014 (Section 1 injunction)	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.
Public Spaces Protection Order	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).
Community Protection Warning/Notice	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.
Closure Order	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.		
Highways Act 1980	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 negative impacts of rough sleeping

Introduction

Our Policy approach: The City of London Corporation (the City Corporation) is committed to helping those who find themselves homeless on the streets. This means providing help and support, and safely managing the areas in which people sleep rough.

Sometimes there are impacts – such as increased antisocial behaviour – that are associated with rough sleeping which can have a negative impact on those homeless and on the wider community. Where these impacts are problematic, the City Corporation may use legal powers to manage and reduce them.

Balanced and proportionate

The approach to using legal powers to tackle some problems is described below. It aims to ensure there is a balanced and proportionate response that supports those who are vulnerable, and protects both them and the communities of the City. Our response to some issues may need the use of legal powers, but these powers are never used solely because someone is sleeping rough or homeless.

Credible Offers of support

Our approach sits alongside our Credible Offers Policy¹ - which commits to ensuring that everyone homeless on the streets of the Square Mile has a route off the streets. For many this will be accommodation, and for others it will be support to regularise immigration status or to achieve a planned and supported return to a home country.

Complexity and harm

Rough sleeping is complex. Many of those who sleep rough in the City are entrenched and have multiple 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.

However, long term rough sleeping puts individuals at risk. 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.

Welfare first

¹ <https://democracy.cityoflondon.gov.uk/documents/s139976/App.%201%20to%20Credible%20Offer%20Policy.pdf>

The approach we are setting out, balances our commitment to a welfare driven approach to rough sleeping, with the need to ensure the City is a safe, secure and accessible environment for all. Any intervention to address negative impacts will only be undertaken where there is both clear evidence of the support offer provided to individuals, and of the impact their behaviour or actions have.

Supporting those who sleep rough

Our Policy approach: The City 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.

Our services, along with those provided by our partners, prioritise the urgent need to support individuals in transitioning away from street homelessness and mitigating the harms associated with long-term rough sleeping.

Limited or no recourse to public funds

Some of those who sleep rough have “No Recourse to Public Funds”. This is a legal immigration restriction imposed by government policy which prevents the individual concerned from accessing welfare benefits and support other than in exceptional circumstances.

With people in this circumstance our services will work to ascertain if there is any underlying entitlement to public funds through, for example, achieving settled status under the EU scheme or working with advice/legal services and/or the Home Office to regularise immigration status. If this cannot be achieved – making a credible offer of accommodation impossible – the outreach team and our assessment centre staff will work with the individual rough sleeper to achieve a planned and supported return to a home country.

Consideration will also be given to providing temporary accommodation rough sleepers while immigration status is confirmed. In this case reasonable timescales should apply.

Supporting our communities

Our Policy approach: 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 to safeguard those who are vulnerable and those in our wider community. We will always take a welfare first approach.

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

Rough sleeping can sometimes be associated with activities like aggressive begging, street drinking, substance misuse and other antisocial behaviour. Encampments of tents can block pavements or put off people from using the pavement.

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.

Were the City Corporation intervenes to address these impacts, it 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.

Antisocial behaviour

Antisocial behaviour is defined as 'behaviour by a person which causes, or is likely to cause, harassment, alarm or distress to persons not of the same household as the person' ([Antisocial Behaviour Act 2003](#) and [Police Reform and Social Responsibility Act 2011](#)).

There are three main categories for antisocial behaviour, depending on how many people are affected:

- Personal antisocial behaviour is when a person targets a specific individual or group.
- Nuisance antisocial behaviour is when a person causes trouble, annoyance or suffering to a community.
- Environmental antisocial behaviour is when a person's actions affect the wider environment, such as public spaces or buildings.

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 is well evidenced and meets 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

We will remove abandoned belongings if there is a public health risk, if they are causing an obstruction or if the owner tells us they no longer want them. We will remove belongings where they present a risk - such as a fire risk. Confiscation and destruction of tents or other personal possessions is not and never will be part of our approach for reducing rough sleeping.

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.

We recognise that some possessions – such as identification documents – are very important, and hard to replace. We will retain these documents and work with homelessness services within and beyond the Square Mile to ensure that they are returned.

Removal of tents or other personal possessions

We will not confiscate or destroy tents or other personal possessions as part of our approach to 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 that have been clearly abandoned and are no longer being used we will remove them tents, and store them so they can be retrieved.

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 Team 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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Appendix 4 – Equality Impact Analysis

The Proposal

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1. What is the Proposal

This proposal seeks to define the City of London Corporation’s approach to tackling the negative effects of rough sleeping within the Square Mile. The City of London Corporation is committed to ensuring those who sleep rough on the Square Mile have a route off the streets tailored to their needs and circumstances. 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. Rough sleeping can also be associated with activities like begging, street drinking, substance misuse and other antisocial behaviour. 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 Square Mile.

The proposal ensures there is a balanced and proportionate response that supports those who are vulnerable and protects the communities of the City. It balances the Corporation’s commitment to a welfare driven approach, whilst also ensuring that the City is safe, secure and accessible for all. Any intervention to address negative impacts will only be undertaken if there is clear evidence of both support offer provided and the negative impact of their behaviour.

2. What are the recommendations?

Outcome 1: The Corporation will continue to offer routes off the streets for all rough sleepers.

Outcome 2: The Corporation established a framework to address the negative effects of rough sleeping (antisocial behaviour)

Outcome 3: This proposal will work with the current Homelessness and Rough Sleeping Strategy 2023-2027.

3. Who is affected by the Proposal?

This proposal will affect rough sleepers in the Square Mile who sleep in encampments. Those sleeping rough in the Square Mile are predominately white British nationals between 26 and 45 years of age. Rough sleeping presents considerable risks to health and wellbeing. Research by the homeless charity Crisis reports that people sleeping on the street are almost seventeen times more likely to have been victims of violence in the past

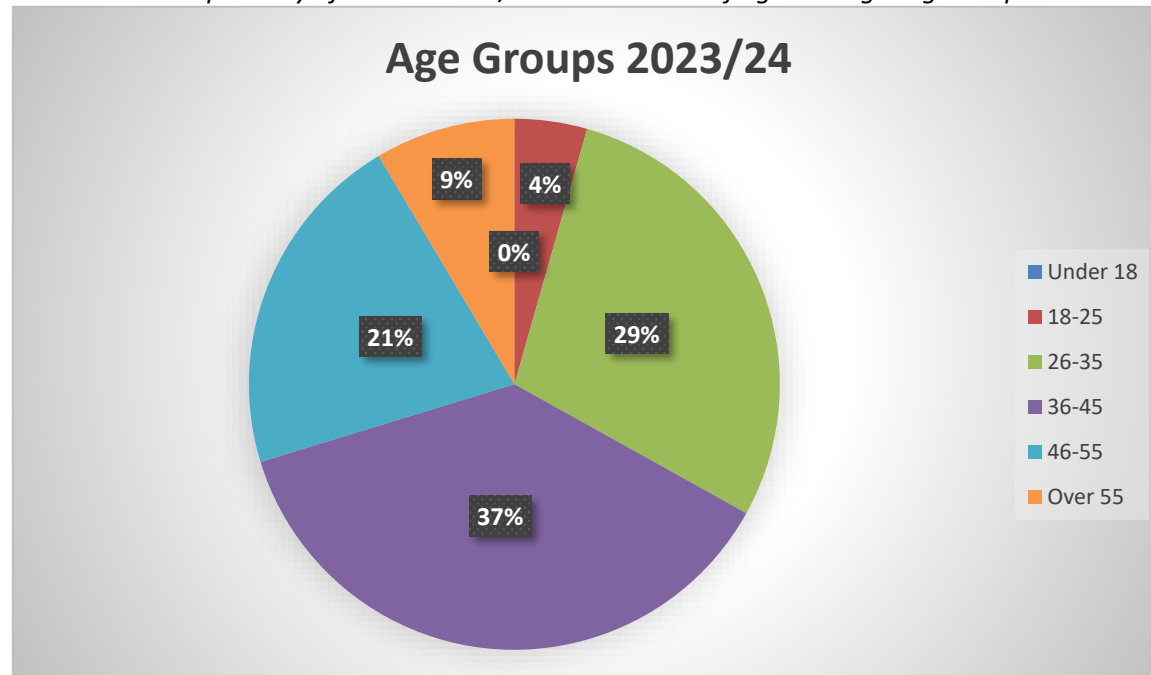
year compared to the general public. People experiencing homelessness and rough sleeping have a greatly reduced life expectancy. Homelessness support services also express concern that rough sleeping in tents can increase the risk of financial and sexual exploitation.

Age

Check this box if NOT applicable

Age - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*
The chart below shows the age profiles of those recorded as rough sleeping in the City of London from counts conducted in 2023/24. The largest cohort of rough sleepers remains the 36-45 year old (37.20%) ages 26-35 and 46-55 are the next highest (28.66% and 21.19% respectively). The City of London has a relatively low percentage of rough sleepers over the age of 55, and under 25 (8.54% and 4.42% respectively). The majority of the rough sleepers identified in the City of London are working age.

Chain Annual Report City of London 2023/24 – Breakdown of age among rough sleepers:



What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

Young People

The City of London has low figures for those aged 25 and under sleeping rough. However, this figure will not include or identify the 'hidden homeless' who are more likely to be young people.

Action for Children have estimated that over 136,000 children and young people are homeless in the UK. [\(What is the extent of youth homelessness in the UK? | Action For Children\)](#) – accessed October 2024. Research from Centrepont also shows that there are strong links between rough sleeping as a young person and long-term rough sleeping and social exclusion in later life.

The drivers and impacts of youth homelessness and rough sleeping are often very different from those of older adults, and as such consideration of these issues should be included in any work, and distinct and tailored services and support in both the statutory and voluntary sector are in place.

The research from Centrepont (Centrepont (2019) No place to stay: Experiences of Youth Homelessness. London: Centrepont.) also suggests that challenges related to the cost of living have intensified the key drivers for youth homelessness and rough sleeping for example family breakdown and domestic abuse.

Older People

*Research also supports that homelessness amongst older people is also increasing, with the Centre for Policy and Aging rapid review (2017) [\(CPA-Rapid-Review-Diversity-in-Older-Age-Older-Homeless-People.pdf\)](#) showing that between 2010 and 2015 the number of street homeless older people has more than doubled. The increased health issues experienced by those who are homeless and rough sleeping is likely to have a higher significant impact on those over 50 years of age - considered older people (Crane M and Warnes A M (2010) Homelessness among older people and service responses, *Reviews in Clinical Gerontology*, 20; 354-363).*

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The vast majority of individuals sleeping rough in the Square Mile are of working age. However, before a specific encampment is considered for action, the age profiles of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

Again, as with young people the drivers for homelessness in older people, is often different from other age demographics. Older women are more likely to cite relationship breakdown as a reason for becoming homeless, while older men associate becoming homeless with job loss and drug and alcohol problems (Crane & Warnes, 2010).

Homeless older people are more likely than other groups to experience social isolation and its associated problems, as well as issues surrounding personal safety and health (Warnes A, Crane M, Whitehead N and Fu R (2003) Homelessness Factfile Sheffield Institute for Studies on Ageing, University of Sheffield; Crisis).

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#).

A number of demographics and projections for Demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

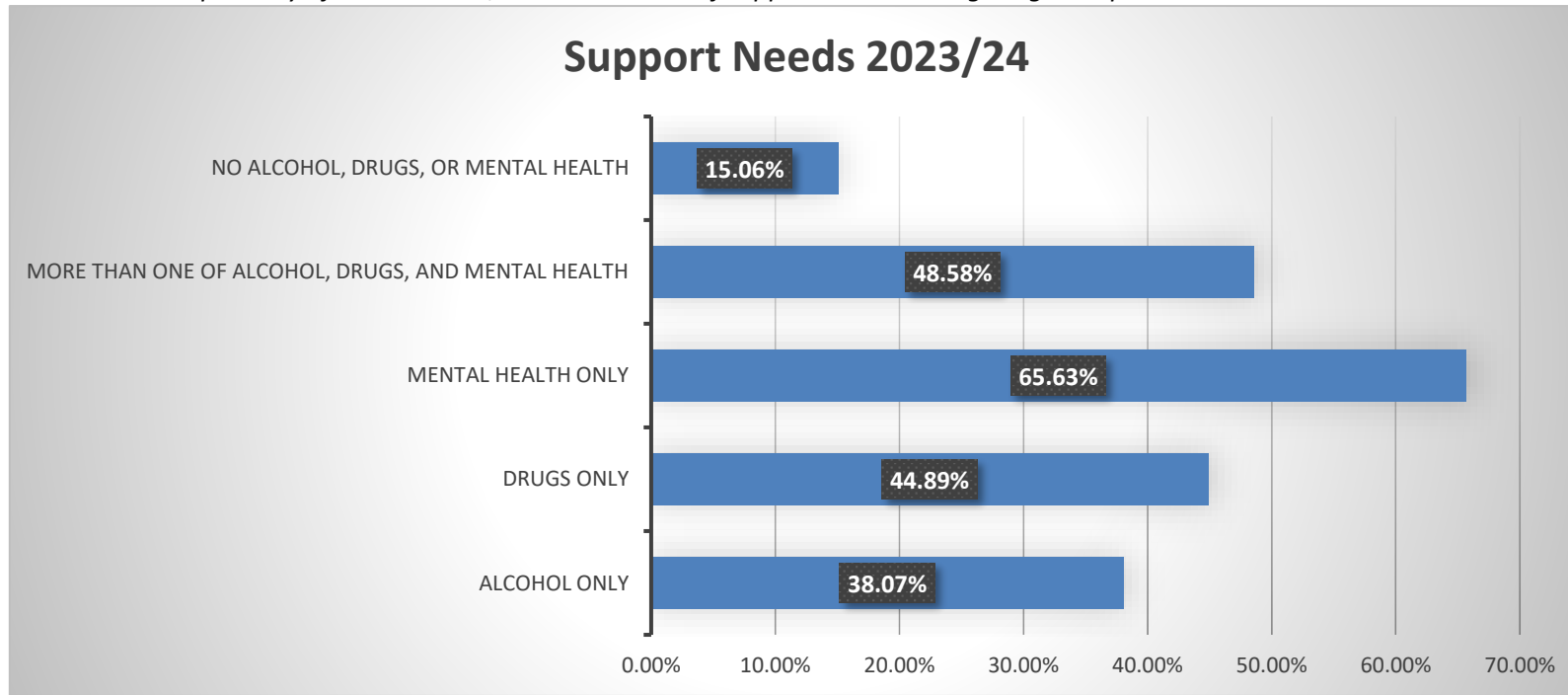
NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Disability

Check this box if NOT applicable

Disability - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*
The Combined Homelessness and Information Network (CHAIN) analysis from 2023/24 showed that 47.60% of all recorded rough sleepers, had mental health support needs. This figure went up to 65.63% of all rough sleepers within the City of London, although it should be noted that CHAIN does not record any data on the other disability status of rough sleepers.

Chain Annual Report City of London 2023/24 – Breakdown of support needs among rough sleepers:



What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Issues surrounding disability and homelessness also need to consider the increase in disabilities and long-term health conditions that are associated with older ages.

Research by Action for Children suggests that compared to the general population, individuals who are rough sleeping are far more likely to report mental health issues. A report for the City of London on healthcare for rough sleepers (Revolving Doors Agency, Health care provision for people sleeping rough in the City of London, June 2018) identified the following challenges:

- Health needs and preferences of people experiencing rough sleeping are not known or shared between services working with them.

- People experiencing rough sleeping in the City of London are likely to be accessing health services elsewhere in Greater London. Although little is known about the circumstances, experiences and effectiveness of treatment received, evidence suggests that experiences and outcomes are unlikely to be positive. It is also unclear if care and support services on offer to housed residents in City of London are accessible to people sleeping rough e.g. those accessed through a Care Act assessment.

- Mental ill-health is a significant issue for people experiencing rough sleeping. There is no clear pathway to services, and gaps in services, across the spectrum of need, for people in this situation, and those who have moved off the streets e.g., living in the Lodge, who may need continued support to sustain their homes.

- There are many services working across sectors that engage with people experiencing rough sleeping in the City of London, albeit to achieve different and potentially conflicting outcomes. Provision is weighted towards reactive and crisis management rather than planned and preventative. There is more than one meeting of partners to discuss individual cases and it is unclear how they relate, who is accountable for what, or how learning is applied.

The Housing Act (1996) prioritises housing for disabled people and those with health conditions.

The United Nations Convention on the rights of Persons with Disabilities (UNCPRD) has introduced a new benchmark for the provision of adequate housing to disabled

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Before a specific encampment is considered for action, the support needs of rough sleepers within must be assessed through a Care Act assessment to ensure they are not going to be disproportionately affected by any action.

Care and support needs should be assessed through a Care Act assessment as it must be assumed that:

- Physical and/or mental ill-health are associated with rough sleeping, and there are likely needs arising from this ill-health;*
- These needs are likely to prevent an individual sustaining a home and related outcomes e.g., accessing work;*
- The needs and inability to achieve the specified outcomes cause or risk causing a significant impact on their wellbeing.*

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

<p>people.</p>	
<p>Key borough statistics: Day-to-day activities can be limited by disability or long-term illness – In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Additional information on Disability and Mobility data, London, can be found on the London Datastore.</p>	<p>The 2011 Census identified that for the City of London’s population:</p> <ul style="list-style-type: none"> • 4.4% (328) had a disability that limited their day-to-day activities a lot • 7.1% (520) had a disability that limited their day-to-day activities a little <p>Source: 2011 Census: Long-term health problem or disability, local authorities in England and Wales</p> <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Gender Reassignment

Check this box if NOT applicable

Gender Reassignment - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*
No data is collected on the gender reassignment status of rough sleepers as part of the regular CHAIN reporting, so this impact is neutral.

<p>What is the proposal’s impact on the equalities aim? <i>Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact</i></p> <p><i>Gender identity is not identified in English homelessness statistics, even though AKT’s research suggests that within the LGBTQ+ community, it is trans young people who are currently suffering the most. DLUHC confirms to Inside Housing that local authorities are instructed to collect data on gender identity. The official question asks people to identify as “male”, “female” or “transgender”. But most trans people would be unlikely to tick that last option.</i></p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p><i>Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.</i></p> <p><i>The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.</i></p>
<p>Key borough statistics:</p> <ul style="list-style-type: none"> Gender Identity update 2009 - ONS 	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Pregnancy and Maternity

Check this box if NOT applicable

Pregnancy and Maternity - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

CHAIN data for rough sleepers in the City of London only identifies a small population of female rough sleeps (7%) and no data recorded for pregnancy or women rough sleeping with children.

What is the proposal's impact on the equalities aim? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

Families with children are generally prioritised as they are identified as needing statutory support. The highest reason for households to be accepted as in priority need is due to have dependants (across England there were 38,370 cases accepted due to this reason in 2017). Due to individuals faced with homelessness often fail to be recognised as vulnerable, despite being in danger, particularly single males who are identified as being at the lowest priority need.

Reports from St. Mungo's show that socially excluded and vulnerable women are less likely to engage with services and have an increased risk of maternal death. Pregnancy is also a period where an individual is more vulnerable from a variety of factors, including an increased risk of abuse and exploitation. Pregnancy has also been shown to either start or escalate domestic abuse. (Saving Mothers Lives – Reviewing maternal deaths to make motherhood safer: 2006-2008 (2011) British Journal of Obstetrics and Gynaecology, vol 118, S.1.).

Access to health care is frequently cited as a barrier to those homeless and rough sleeping, and therefore during periods of pregnancy and maternity, when access to access to health care is important, and this should also be in consideration.

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Contraception and Fertility Rates](#)
- [Live Births](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Despite the City of London having low numbers of women with dependants or pregnant women, services must still be capable of responding to their needs in suitable ways. This demographic is generally prioritised as in priority need; therefore this proposal and on-going actions must look at how these individuals are supported.

Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

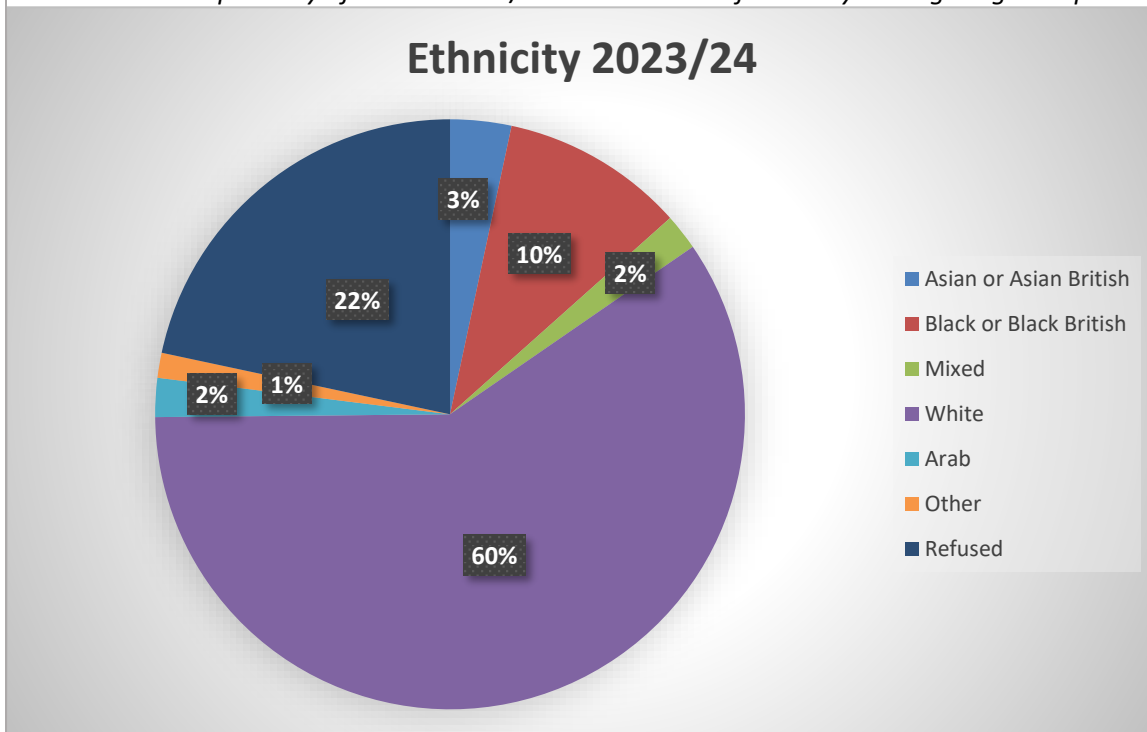
NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Race

Check this box if NOT applicable **Race - Additional Equalities Data (Service Level or Corporate)** *Include data analysis of the impact of the proposals*

The majority of the rough sleepers recorded in the Square mile in the 2023/24 CHAIN report were white (59.45% in total with the largest proportion being White British – 43%).

Chain Annual Report City of London 2023/24 – Breakdown of ethnicity among rough sleepers:



What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

A report from Crisis shows that there is clear evidence that ethnic minority and global majority groups are disproportionately affected by homelessness. Compounded with this is the increased likelihood for working adults from these communities to be in less affordable housing.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

This policy must have an understanding of race issues and the problems facing individuals with NRPF.

This could be done through:

10% of applications for prevent and relief duty in 2020-21 were from Black led applicants, which when considered that in England lack people make up 3.5% of the population indicates the disproportionality of the risks to homelessness. According to research conducted by Shelter Bangladeshi households are also twice as likely to claim housing benefits than white households. ([The fight for home is a fight against racism - Shelter England](#)).

Anecdotal studies have found that abuse, threats, and assaults as hate crimes in hostels also lead to many global majority individuals preferring to rough sleep or sofa-surf than go into hostels, and very little research has been carried out in this arena.

Immigration policies and controls also have an influence in this area, and for those with No Recourse to Public Funds (NRPF) it is even more challenging to access support. Those with NRPF are more likely to skip meals, rely on food banks and face increased debt ([Why are people of colour disproportionately impacted by the housing crisis? | Shelter](#)). And even [research](#) from the Joint Council for the Welfare of Immigrants (JCWI) in 2017 found that over half of landlords (51%) were less likely to consider renting to foreign nationals from outside of the EU because of the Right to Rent scheme

Despite the population of City of London rough sleepers and statutory homeless being predominately UK nationals and white, awareness and training of the challenges facing the BAME, and non-UK population are essential.

Research has also shown that a multi-agency multi-disciplinary approach is key to responding to issues raised in these communities.

- Training for all front-line staff on the challenges faced by different population groups, including prejudice from the private rent market.
- Training for staff on how to support non-UK nationals, including ensuring they access the full range of support they are entitled to.
- Commissioning work into how services can tailor their support to meet the different needs of the population based on nationalities and cultural responses.

Through the national homelessness strategy, a cross-government working group has been set up around supporting non-UK nationals off the streets. There has also been a commitment of £5 million new funding to support non-UK nationals who sleep rough, with an increased focus on rough sleeping in the Controlling Migration Fund.

Before a specific encampment is considered for action, services available to support NRPF rough sleepers are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

Key borough statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White-Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

See [ONS Census information](#) or [Greater London Authority projections](#).

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Religion or Belief

Check this box if NOT applicable

Religion or Belief - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

Data is not collected on the religion or belief of rough sleepers, those at risk of homelessness or those applying to the City of London for prevention or relief duties. Despite this there are faith groups that provide support for rough sleepers in the City of London

What is the proposal's impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

There is little to no research available in the United Kingdom for the direct or indirect impacts of spirituality and belief on incidents or individuals. The Department of Health (2011) identifies belief and spirituality as a broader way in which individuals understand and live their lives, through their core beliefs and values (Department of Health. 2011. Spiritual Care at the End of Life: a systematic review of the literature.).

There are anecdotal reports that religion and belief may lead to incidents of homelessness and rough sleeping, for example where differences in family beliefs may lead to family breakdown and tensions leading to homelessness and exclusions.

Also linked to this is the Hate Crime that may be experienced by an individual through perception of faith based on race.

Key borough statistics – sources include:

The ONS website has a number of data collections on [religion and belief](#), grouped under the theme of religion and identity.

[Religion in England and Wales provides a summary of the Census 2011 by ward level](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

This policy must ensure the awareness and understanding of faith issues are factored into full wrap around support – from prevention to ensuring that no one needs to return to homelessness.

This could be done through:

- *Consideration to training for all front-line staff on the challenges faced by different faith groups, including prejudice that may exist within the faith*
- *Training for staff on how to support non-UK nationals, including ensuring they access the full range of support they are entitled to.*
- *Commissioning work that ensures that no individual is excluded on the basis of faith.*

Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

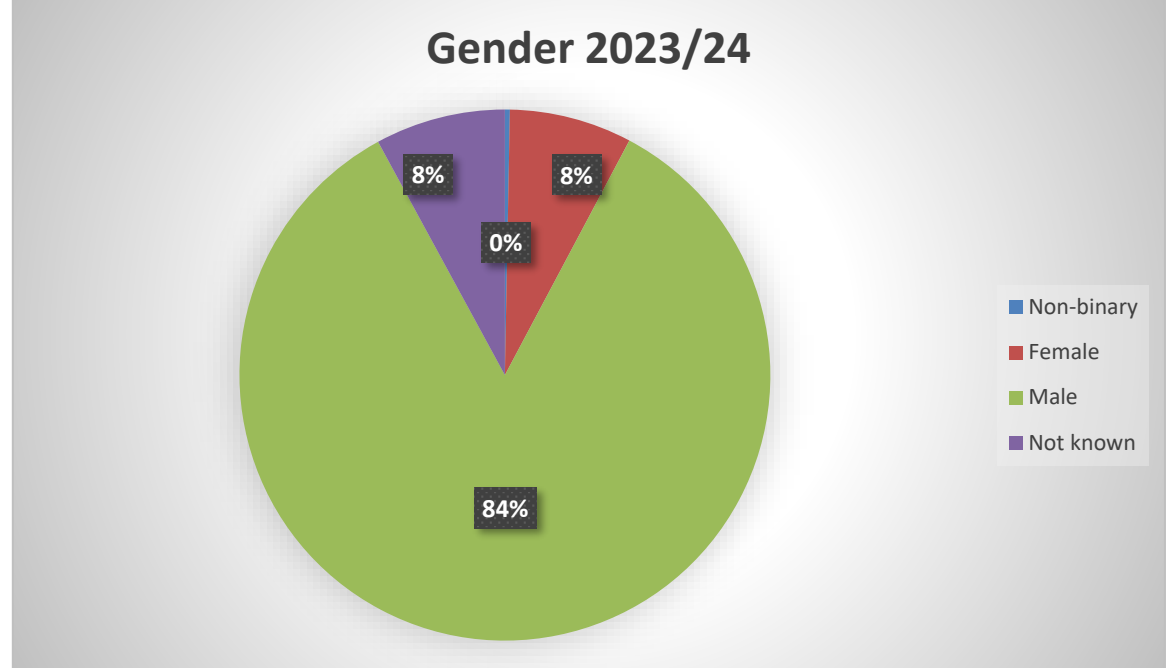
NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Sex

Check this box if NOT applicable

Sex - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*
The 2023/24 Annual CHAIN report showed that the overwhelming majority of Rough Sleepers in the City were male- 84.30%. Only 7.47% of all recorded rough sleepers that year had been female.

Chain Annual Report City of London 2023/24 – Breakdown of sex among rough sleepers:



What is the proposal’s impact on the equalities aim? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

2021 saw a shift in focus for many organisations to identify and create work specifically to support women who experience homelessness and rough sleeping. Especially as it is well known that women are likely to be much harder to identify. There is growing evidence that men and women experience homelessness differently, and the results of gender-neutral services can often lead to women avoiding seeking support.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

- Even if few, actions to support women sleeping rough in the City of London will be important for this policy.*
- Training for all front-line staff that may come into contact with females suffering from domestic abuse that need help.
 - Training for all outreach workers on how to best support any females found sleeping rough in the City of London.

Women who are homeless are especially vulnerable to violence and experience risk differently to men, subject to stigma, sexual abuse and harassment, robbery, and severe stress, in addition to violence, with the serious impact on physical and mental health that this has, as well as on self-esteem (Groundswell (2020) Women, homelessness and health: A peer research project. London: Grounswell).

Homelessness is frequently viewed through the perspective of rough sleeping, yet studies have found that women will turn to sleeping on the streets as a last resort, as they would be at such risk, opting for other precarious and potentially unsafe arrangements, such as long-term sofasurfing, remaining with or returning to dangerous partners, or sexual exploitation in exchange for accommodation (Bretherton, J. and Maycock, P. (2021) Women's Homelessness: European Evidence Review. Brussels: FEANTSA.).

Mitigation of disadvantage among the statutory homeless can be done by ensuring that the duties under the Homelessness Reduction Act (HRA) 2017 are fully undertaken by the City Corporation. The HRA provisions require local housing authorities to provide homelessness advice services to all residents in their area and expands the categories of people who they have to help to find accommodation.

Individuals will be better supported through:

- A strengthened duty to provide advisory services.
- An extension to the period during which an applicant considered 'threatened with homelessness' from 28 to 56 days.
- New duties to assess all applicants (**now including those who are not in priority need**) and to take reasonable steps to prevent and relieve homelessness.
- These steps will be set out in a personalised housing plan that, wherever possible, must be agreed between the local authority and the applicant.
- Strengthen understanding of VAWG and the direct and indirect impacts on women.

Before a specific encampment is considered for action, the support needs of female rough sleepers are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

Key borough statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Sexual Orientation

Check this box if NOT applicable

Sexual Orientation - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

Data is not collected on the sexual orientation of rough sleepers, those at risk of homelessness or those applying to the City of London for prevention or relief duties.

What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Action for children estimate that 24% of all homeless young people are LGBTQ+.

Many people in the LGBTQ+ community, do not feel comfortable disclosing their sexual orientation or gender identity when rough sleeping.

While young LGBTQ+ people are generally able to move on and exit the cycle of homelessness permanently, a 2018/19 study by Shelter found that trans people are at risk of homelessness and housing precarity throughout their lifespan.⁵⁶ Common themes for young trans people are becoming trapped in unsafe relationships upon which their housing is dependent and with no family to turn to, sofa surfing, and experiences of hate crime, domestic abuse and sexual exploitation. The research also indicated that trans people had an overwhelmingly negative view of mainstream services and thus were unlikely to seek out services that could support them. This was due to a perception that they would not have anything to offer them that met their needs.

Key borough statistics:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity - ONS](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that it is unclear how many LGBTQ+ people are among the City of London homeless population, it is critical that all front-line staff are aware of specific LGBTQ+ services and that signposting to these services makes up part of the standard package offered.

The Homelessness Strategy and on-going actions ensure that training and awareness is incorporated across all service front line staff on how to effectively support LGBTQ+ people.

Before a specific encampment is considered for action, the sexual orientation of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Marriage and Civil Partnership

Check this box if NOT applicable

Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate) *Include data analysis of the impact of the proposals*

No data is collected on the marital or civil partnership status of rough sleepers as part of the regular CHAIN reporting. Some commissioned service partners have reported challenges when working with couples who are homeless and being able to provide them with appropriate support and accommodation.

What is the proposal's impact on the equalities aim? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Rough sleeping couples have become a familiar sight on the streets of many English towns and cities. The BWC report shows that most of these relationships develop among those already homeless, fuelled by a belief among highly vulnerable women that they are safer on the street in a couple, even where a relationship might be controlling, abusive or harmful. (Brighton Women's Centre, Couples first? Understanding the needs of rough sleeping couples, October 2018).

Fewer than 10% of services in England will accept couples together, meaning that the couple may choose not to access support at all rather than be housed separately (St Mungo's (2020) Homeless Couples and Relationships Toolkit. London: St Mungo's).

Key borough statistics – sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Though there may be few couples sleeping rough in the City of London this proposal must support these people through continued:

- *Training for all front-line staff that may come into contact with couples sleeping rough. Such training should include being able to support couples into accommodation should they wish to stay together and also being able to identify whether there is any abuse.*
- *Ensuring the rough sleeping services commissioned by the City of London are supportive of couples that wish to remain together in seeking accommodation.*

Before a specific encampment is considered for action, the support needs of rough sleepers within are crucial to ensure they are not going to be disproportionately affected by any action.

The Corporation will also continue to provide routes off the streets for rough sleepers in line with the Homelessness and Rough Sleeping Strategy 2023-27.

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Additional Impacts on Advancing Equality and Fostering Good Relations

Check this box if NOT applicable

Additional Equalities Data (Service Level or Corporate)

Click or tap here to enter text.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of the information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service
- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

Additional Impacts on Social Mobility

Check this box if NOT applicable

Additional Social Mobility Data (Service level or Corporate)

Click or tap here to enter text.

Are there any additional benefits or risks of the proposals on advancing Social Mobility?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote the aims or to mitigate any adverse impact on social mobility. This is a voluntary requirement (agreed as policy by the Corporation) and does not have the statutory obligation relating to protected characteristics contained in the Equalities Act 2010. Analysis should be based on the data you have available on social mobility and the access of all groups to employment and other opportunities. In addition to the sources of information highlighted above – you may also want to consider using:

- Social Mobility employment data
- Generic or targeted social mobility consultation results or research that is available locally, London-wide or nationally
- Information arising from the Social Mobility Strategy/Action Plan and the Corporation's annual submissions to the Social Mobility Ind

Conclusion and Reporting Guidance

<p>Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.</p> <p>If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.</p> <p>If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.</p>	<p>Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.</p> <p>Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.</p>
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This analysis has concluded that ...
This analysis has indicated that the proposal has little potential for discrimination against protected characteristics. The proposal will have no negative impact on protected characteristics of race, gender, disability support needs, and age of rough sleepers. This assessment will be updated if new data emerges

Outcome of analysis – check the one that applies

Outcome 1
 No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Outcome 2
 Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustment will remove the barriers identified.

Outcome 3
 Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have ‘due regard’. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4
 Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director: <i>Simon Cribbens</i>	Name: <i>Simon Cribbens</i>	Date <i>22 November 2025</i>
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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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