



**DEPARTMENT OF COMMUNITY AND CHILDREN'S SERVICES.**

**ROUGH SLEEPING: CREDIBLE OFFERS POLICY**

## 1. Introduction

The City of London's Homelessness Strategy 2019-23<sup>1</sup> sets out, amongst other things, how the City will work to end rough sleeping in the Square Mile in support of both the Mayor of London and the Government's strategic intention to do the same.

Our strategy states clearly that *“all those who are homeless on the streets of the City of London will be given an offer that will end their homelessness”* so that *“no-one has to live on the streets of the Square Mile.”*

Rough sleeping statistics show that the majority of those who sleep rough in the City of London have a primary local connection to another area - whether in London, the UK or overseas. However, rather than using local connection rules to refuse to provide support to rough sleepers bedded down in the City, we feel it is our responsibility, as set out in the strategy, to make an offer of accommodation so that the individual can be supported off the streets as rapidly as possible. The scarcity of affordable move on accommodation (whether temporary or permanent) in the Square Mile means that often the offer that will be made will usually be for accommodation outside of the City but we wish to ensure the offer is as credible as possible so as to maximise the chances of each individual rough sleeper sustaining a life away from the streets.

This policy sets out what we in the City of London feel constitutes a “credible offer” of accommodation when we are supporting a rough sleeper to find a route off the streets. It also explains how the City of London outreach team will manage, and document, credible offers so that there is clarity on all sides and what happens in the unlikely event that an individual rough sleeper is unable or unwilling to take up such an offer.

This policy applies to those sleeping rough in the City, or rough sleepers who have been temporarily accommodated, to whom the City does not owe a duty under homelessness legislation. Where a statutory duty is owed, a different approach will be taken as governed by the law and the working practices of our Housing Options team. Details [here](#).

The policy has been independently reviewed by Homeless Link prior to its adoption and will be reviewed internally every six months.

## 2. What constitutes a “credible offer”?

Many local authorities have outreach teams that operate a “single service offer” policy, though this is not always written down. This means that a rough sleeper will be offered a single route away from the streets which they are expected, and encouraged, to take up. Usually, the individual is denied further assistance if the identified “single service offer” is refused as a means of encouraging take up.

Often this “single service offer” is an offer of accommodation considered suitable to the individual's needs (though perhaps not always in their preferred location). Sometimes it is an offer of supported reconnection to a home area with suitable accommodation identified and available to that specific individual. But, sometimes, the “single service offer” is an offer of reconnection to a home area without accommodation being identified and without support being provided.

The “single service offer” is usually recorded on CHAIN so that any outreach service or day centre working with the individual understands what has been offered and can reinforce

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<sup>1</sup> <https://www.cityoflondon.gov.uk/assets/Services-DCCS/homelessness-strategy-2019-23.pdf>

the message that it remains the only route off the streets offered to the individual unless their circumstances change significantly.

In the City, our 24/7 assessment centre will offer an immediate “route off the streets” for all rough sleepers (unless the No Second Night Out service is appropriate and available). The assessment centre will provide a safe space in the City within which a rough sleeper can have their immediate needs met (physical and mental health, substance use, benefits) and work with staff to determine a credible accommodation offer, which may include supported reconnection to another area.

The City wishes to do better than to make a “single service offer” and, to that end, this policy ensures that rough sleepers bedded down in the Square Mile receive at least one “credible offer” of accommodation and support which, if accepted would make it unnecessary for them to sleep on the streets. This is a separate process to the initial ‘route off the street’ offer routinely made to rough sleepers. We recognise that, despite our best efforts, this offer is not always accepted, and work should continue to develop a credible offer, while the client remains rough sleeping if necessary.

We define a credible offer as one that:

- Provides access to accommodation (hostel room, shared or self-contained housing, supported or independent) that meets the housing and support needs of the individual for at least the next six months
- Provides access to accommodation that is affordable
- Provides access to accommodation that is safe and sustainable given the individual's support needs and circumstances
- Provides access to accommodation in an area where the individual has, or can develop, social capital
- Has been discussed in detail with the individual rough sleeper so that the limitations, advantages and disadvantages of the offer are understood
- Includes all necessary support to take up the offer of accommodation (eg: travel costs, moving costs, being accompanied)
- Where relevant and/or required by the accommodation provider, includes an identified longer term move on option.

Local connection rules, and the general scarcity of accommodation, means that local authorities often restrict access to accommodation pathways to those with a local connection and this means that the chances of being able to access suitable accommodation increase if an approach is made to a home area. For rough sleepers in the City of London, the majority of whom have a local connection outside of the City, the best available accommodation might be in another area but reconnection to an area outside of the City must always be underpinned by a detailed move on plan which guarantees that the individual will get the support they need to take up the credible offer of accommodation secured for them in that area and be properly linked in to local support services so they can sustain that accommodation.

The City does not consider that ticket-only reconnection – where rough sleepers are encouraged to board a bus, train or plane to another area without accommodation waiting for them – represents a credible offer. This is not only unfair to the individual but likely to be counterproductive as, without a credible offer of accommodation in that area, the rough sleeper may return to rough sleeping, in the City or elsewhere. We will only offer ticket-only reconnections where it is the explicitly stated intent of the individual that this is all they require.

In normal circumstances, a credible offer would also be one which the individual rough sleeper was completely supportive of. However, given the reality of the scarcity of affordable accommodation in the City, and in London in general, and the gatekeeping policies adopted by many local authorities, we recognise it will not always be possible to offer accommodation of a type or in an area which is the individual rough sleeper's absolute preference.

The City will continue to work to increase the availability, and variety, of accommodation which can be offered to rough sleepers who are bedded down in the City so as to better meet needs and offer more choice in determining a credible offer for each rough sleeper. This includes developing more supported accommodation, increasing the availability and variety of private rented sector accommodation, developing relationships with housing providers outside of London and outside of the UK, maximising use of the Clearing House and using Housing First as an option where appropriate. Under some circumstances, offer recipients may be asked to consider accommodation offers beyond Greater London.

### **3. The operation of this policy**

It is the role of the outreach team (and/or the assessment centre staff) to work with individual rough sleepers to determine a credible offer of accommodation that will support the individual to exit rough sleeping and which is based on their needs, circumstances and preferences (where possible). It is also the role of these staff to ensure that the route into accommodation is expedited as far as possible, fully planned and that all necessary support is made available to the individual to take up the offer.

Service offers should be delivered tactfully and sensitively. Upon receipt of an offer the following timescales should apply:

- A 3-day 'reflection period'. The aim is to allow service users time to disclose additional issues which may affect take-up of their offer, such as: sexuality or history of trafficking
- A further 4 days to prepare to move on – making necessary links with friends/family, statutory and/or voluntary services.

The City will provide sufficient funds to service providers to enable provision of suitable support around moving off the streets. This may include, but is not limited to, travel costs, moving costs, clothing, essential items for the home, rent deposits, and/or worker time to accompany an individual to their accommodation. Experience from service providers suggests that accompanying an individual rough sleeper to their accommodation rather than just making travel arrangements makes it more likely the move will be successful.

A credible offer of accommodation in the UK can ordinarily only be made to rough sleepers who have recourse to public funds (unless, as is rarely the case, they can self-finance their accommodation through wages or other income). Staff 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 is not possible – rendering credible offers of accommodation impossible – the outreach team and assessment centre staff will work with the individual rough sleeper to achieve a planned and supported return to a home country. Ordinarily, this will involve securing accommodation and/or support in-country and we will work with ethical reconnections providers to ensure this can be achieved. Consideration will also be given to temporarily accommodating rough sleepers while immigration status is confirmed. In this case reasonable timescales should apply.

Translation services will be offered as necessary to enable non-English speakers to fully understand their credible offer and consideration will be given to the wording and structure of offers to guarantee clarity and avoid confusion and ambiguity.

Working in a psychologically informed way, staff will seek to develop and secure agreement of, and engagement with, the credible offer of accommodation. Credible offers – once determined – will be documented, with a copy being provided to the individual rough sleeper. The reasons why the offer[s] is/are felt to be credible will be included and the right of review. It will also be entered on CHAIN.

Where an individual indicates they are not happy with their offer, it will be discussed with them and they will be given the opportunity to have the offer reviewed by either the Outreach Manager (or their delegate if they are not available) or the Assessment Centre manager (or their delegate if they are not available). On the rare occasions that the managers (and/or delegates) are not available, a member of the rough sleeping team in the City will review the offer.

The outcome of the review will either be that the offer[s] is/are considered credible taking into account all the circumstances (ie: the availability of accommodation, the individual's circumstances and support needs, the support available, the strength of their connection to the area where the accommodation has been secured, etc.) or it/they will be withdrawn and another credible offer developed as quickly as possible which addresses whatever deficit or limitation that caused the first offer[s] to be withdrawn.

If, after review, the offer[s] is/are deemed credible and suitable, all steps will be taken to persuade the individual rough sleeper of the benefits of the accommodation secured and of the limitations of what else might be available. This will include making it clear that other boroughs take a similar, and in some cases, much harsher approach so moving to another area to sleep rough will not generate better opportunities.

If the individual continues to refuse to engage with, or accept, the credible offer[s] of accommodation that has/have been made, the following action may be taken:

- For current rough sleepers, outreach workers will be expected to maintain contact, continue to highlight the benefits of the credible offer[s] and look for other opportunities to persuade the individual to accept a route off the street using a personalised and psychologically informed approach so as to prevent entrenchment.
- For those accommodated in emergency accommodation funded by the City (assessment centre, B&B, hotels, hostels, etc), staff will continue to highlight the benefits of the credible offer[s] while making it clear that failure to engage with the move will lead to their current accommodation being withdrawn.
- For those accommodated in temporary accommodation (assessment centre, B&B, hotels, short stay hostels) who still refuse to engage after staff have made it clear that their current accommodation will be withdrawn, four weeks' notice will be served. The credible offer[s] will be re-iterated during the notice period and all steps taken to avoid a return to the streets once the notice period expires.
- For those returning to the streets after having refused one or more credible offers of accommodation, outreach workers will be expected to maintain contact, continue to highlight the benefits of the credible offer[s] but, crucially, keep looking for other opportunities to persuade the individual to accept a route off the street using a personalised and psychologically informed approach so as to prevent entrenchment
- Any enforcement actions directed by the City of London will be linked to demonstrable anti-social behaviour and not the refusal of a credible service offer.

A minority of rough sleepers already have accommodation they can return to (eg: a house they own in Romania, a family in Doncaster who would welcome them home, a council flat in Bexley that they could return to with some support) so, after checking that the accommodation is safe, suitable and still available, individuals in this situation would not be offered further accommodation. Given the scarcity of accommodation in London and the restricted options available to the City, their credible offer would be a supported return to the accommodation they already have available and the credible offers policy, as set out above, would apply.

#### **4. Summary**

Making credible offers of accommodation to a rough sleeper, on the streets or in emergency accommodation, is the best way of securing a sustainable route off the streets and delivering on the City's strategic objective that no-one needs to sleep rough on the streets of the Square Mile.

An offer of accommodation, unreasonably refused, would usually see a local authority discharge their duty to a homeless person under intentionality rules. This credible offer policy seeks to reflect the existing legislation and practice around statutory homelessness in that respect but goes further in ensuring that, where doubts exist about the credibility or suitability of an accommodation offer, a second offer is made.

The policy also goes further than most local authorities in ensuring that all rough sleepers in the City who have recourse to public funds – whether they have a local connection or not – are offered some form of accommodation and all necessary support to take up that accommodation. Where rough sleepers have no recourse, every effort will be made to regularise their status so that they can claim public funds and be made a credible offer. Where this is not possible, ethical, supported reconnection will be offered.

The City does not wish to adopt policies that are significantly different to those of other local authorities in London because there is a danger that, in doing so, we may create a perverse incentive for people to choose to bed down in the Square Mile. However, we will not support ticket-only reconnection practices and we will only consider reconnection a credible offer if accommodation is available in the area where a rough sleeper is being reconnected to. We consider this to be best practice.