

<b>Committee:</b>	<b>Dated:</b>
Homelessness and Rough Sleeping Sub-Committee	03/10/2022
<b>Subject:</b> Statutory Homelessness Summary Report	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	<b>1, 2, 3, 4, 10</b>
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Andrew Carter, Director of Community and Children’s Services	<b>For Information</b>
<b>Report author:</b> Will Norman, Head of Homelessness Prevention and Rough Sleeping	

### **Summary**

This report provides Members with a summary of activity undertaken by the City of London Statutory Homelessness Team between April 2018 and March 2022. The report offers a high-level demonstration of the impact of the implementation of the Homelessness Reduction Act (2017) and the COVID-19 pandemic. The data in the report serves as a baseline for future measurement of the impact of social, policy and economic changes, and the demand on the service that this creates.

The report introduces some key metrics which can be reported on monthly, quarterly or annually. Paragraphs 12 to 17 focus on recent data from Q1 (April to June) 2022/23. Paragraphs 18 to 30 examine long-term trends from April 2018 to March 2022.

### **Recommendation**

Members are asked to note the report.

### **Main Report**

#### **Background**

1. The principal decision-making framework for Statutory Homelessness professionals is Part VII Housing Act (1996). On 3 April 2018, this was amended by the Homelessness Reduction Act (2017).
2. The Homelessness Reduction Act (HRA) represents the biggest change to the rights of homeless applicants since the introduction of Part VII Housing Act in 1996. The new legislation effectively creates two new duties to the original statutory housing duty: the duty to prevent homelessness; and the duty to relieve homelessness.

3. The HRA also includes a greater focus on local partnership working, clearer referral pathways (particularly from public bodies and institutions) and a new emphasis on more client-centred, personalised processes.
4. The HRA 'lowered the bar' for applicants seeking housing assistance, most obviously in the interim duty to accommodate while homelessness is prevented. The changes increased the burden on local housing authorities, both in the administrative sense while homelessness departments were reorganised and retrained, and also in the number of eligible applicants that local authorities are required by law to work with.
5. Prior to the HRA, the City of London had a single full-time Homelessness Officer. During 2017 we engaged the services of a specialist consultant to assess our readiness for the introduction of the HRA. As a result of this process, the service was increased to two full-time, permanent officers.
6. In May 2020, the Government launched the 'Everyone In' call to action. Although not a statutory requirement, this initiative formed the cornerstone of the Local Government approach to homelessness during the COVID-19 pandemic, and it was universally adopted. 'Everyone In' effectively further lowered the threshold by which local authorities should act to prevent or relieve homelessness.
7. The subsequent increase in homelessness approaches, and the additional administration created by the discretionary placements of rough sleepers into temporary accommodation, led to the introduction of a third, full-time, temporary homelessness officer in September 2020.
8. As part of the Target Operating Model process, a Senior Housing Officer role was created to assist with organisation of work, data analysis, complaints and complex cases and time-limited project work.
9. Long-term trend data and feedback from the sector indicates an increase in homelessness approaches as a result of the residual effects of the pandemic and the emerging cost-of-living crisis. To mitigate this, an additional full-time triage role has been created, initially to serve until 31 March 2023.

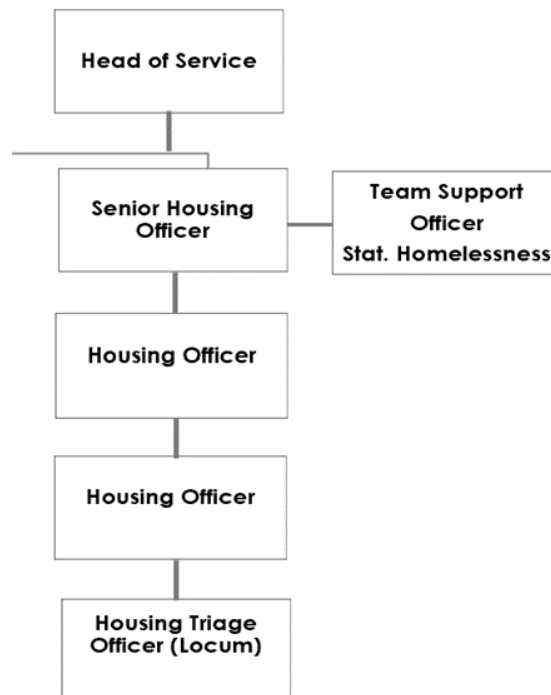
## *Glossary*

10. The language of homelessness legislation can be complex and technical. The following glossary explains terms used in the main body of the report.
  - Approaches – a single individual or household contacting the City of London's Homelessness Department by any means. Approaches can end after a single telephone call, or can commence months of work.
  - Temporary Accommodation (TA) – describes short-term accommodation offered to applicants, either as part of an interim duty or main duty.
  - Placements – usually refers to individuals/households moved into TA as a statutory requirement.

- Discretionary placements – individuals/households moved into TA outside of the statutory duties set out on the legislation, but at the discretion of the service. Often used for rough sleepers or in instances where urgency or risk has been identified but eligibility and entitlement is yet to be determined.
- Prevention Duty (Section 195) – places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless
- Relief Duty (Section 189b) – places a duty on housing authorities to take steps to secure suitable interim accommodation once it has been established that the applicant is homeless and eligible for assistance. If this follows the prevention duty, another 56 days applies.
- Main Duty (Part VII Housing Act) – applies where the relief duty has ended and the housing authority is satisfied that the applicant is eligible for assistance, in priority need and not intentionally homeless. The main duty must be sustained until the housing authority can discharge its duty by securing sustainable accommodation.
- Duty to Refer (DTR) Section 213b – DTR specified public authorities have a duty to identify and refer individuals who are homeless, or may be threatened with homelessness, to a local housing authority of the individual's choice. DTR can be used by 'wider agencies' on a non-statutory basis, such as outreach teams and day centres.
- Household – refers to the applicant and any dependents falling within the applicant's case. A household can be an individual or a family group.

## Current Position

11. Service area team structure:



## Q1 2022–23

12. In April and May 2022, the service managed 40 approaches. In June, the number dropped to 25. For the quarter, this is an average of 35 approaches per month.
13. In Q1, 13 households were placed into TA. By the end of June this brought the total TA population to 66 households.
14. Of these placements, 35 were made on a discretionary basis for rough sleepers; 22 were statutory placements; and the remaining 9 cases closed during the quarter.
15. Of the statutory placements, seven are for instances where we have accepted a main duty and the applicant is being accommodated pending resettlement into long-term sustainable accommodation.
16. One placement is for an applicant who has appealed a negative decision and we have agreed to accommodate, pending an s.202 review.
17. The remaining 14 are placements made under the s.188 interim duty to accommodate.

## *Long-term trend – April 2018 to March 2022*

### *Approaches*

18. The HRA emphasised the right for a household to approach any housing authority of their choice. Previously, a local housing authority could legitimately signpost an applicant to an area where they had a firmer local connection, which effectively created gatekeeping. Housing authorities must now assist the applicant to prevent and relieve homelessness, and a referral to another housing authority (s.198b) is then an available measure.
19. Households are often accommodated in TA on an interim basis to help officers determine the correct course of action. Consideration will be given to how long the applicant can remain in their current home if it is suitable and if the applicant is safe.
20. During FY 2018/19, the service managed 87 approaches in total, which equates to an average of 7.25 approaches per month.
21. Since December 2019, when a single new applicant approached the service, the number of monthly approaches has risen significantly.
22. In May 2020, the month 'Everyone In' was launched, the service saw 12 approaches. By February 2021 this had risen to a peak of 49 approaches in a single month.

23. Approaches in FY 2020/21 totalled 338 (a 288% annual increase). Approaches for FY 2021/22 totalled 428 (a 26% annual increase and a 491% increase since 2018/19).
24. The increase in approaches rose steeply between October 2019 and June 2020, and this trend has been sustained for over 24 calendar months. In March 2022 we saw 37 approaches and the average monthly approach figure for FY 2021/22 is 35.6 – more than one per day.
25. By far the most common reason given for approach was ‘asked to leave by friends/family’ (116). The next three most prevalent reasons are ‘eviction with valid notice’ and ‘eviction from supported housing’ (combined 79), ‘advice and information’ (40) and ‘fleeing domestic abuse’ (32).

### *Households in TA*

26. The rate at which the City is accommodating households in TA has risen steadily, but the rate is below the number of approaches we are receiving.
27. The average number of households in TA in 2018/19 was 23. In 2019/20 this figure was 31, in 2020/21 it had risen to 36. In the last financial year, we saw 45. The increase between 2018/19 and 2021/22 represents a 96% rise.
28. Since the introduction of ‘Everyone In’ in May 2020 there has been an increase in the number of rough sleepers placed in TA. Individuals with support needs who are placed in TA receive support from one of the City of London’s commissioned outreach services or the Mobile Intervention Support Team (MIST), set up during the COVID-19 pandemic.
29. A data snapshot from FY 2021/22 shows that, of 32 cases that were closed (the clearest data to evaluate as the case is no longer live and being updated), 28 were discretionary placements and four were statutory. All 32 were placed in Greater London. The average length of stay in TA for these 32 cases was 65.88 days.
30. The following table breaks down the number of households the City assessed as being owed a prevention or relief duty, the number of those which included children, and the number that were subsequently placed in TA.

	Households	With children	Households with children placed in TA
<b>2018/19</b>	30	6	3
<b>2019/20</b>	19	7	4
<b>2020/21</b>	18	5	5
<b>2021/22</b>	22	5	3

### *Duty to Refer*

31. The HRA introduced a new Duty to Refer (DTR) for a specified list of public bodies. Institutions and bodies include prisons, probation services, job centres, adult and children's social services and hospitals.
32. The referring body is required to establish the applicant's consent, but a referral can be sent to any housing authority that the applicant wishes to approach. Referring bodies are also asked to consider areas where the applicant has a connection or has an existing relationship with services.
33. Referrals received annually by the City of London via DTR are as follows:
  - 2018/19 – 16
  - 2019/20 – 29
  - 2020/21 – 17
  - 2021/22 – 19

### *Outcome data – 2018-2019*

34. None of the prevention cases (16) progressed to the relief phase. This means in every case either the applicant resolved their own situation, or the City assisted in preventing homelessness, for example through mediation with a landlord. Prevention is a core principle of the HRA.
35. Of the 70 relief duties owed, 37 progressed to main duty for decision. Reasons for case closure for the remaining 33 include suitable accommodation being found, applications withdrawn, and applications found to be ineligible.
36. Of the 37 main duty decisions to make in the period, 21 resulted in a main duty being accepted. Where a negative decision was made, on 14 occasions the applicant was not found to be in priority need.
37. Of the 21 cases where a main duty was accepted, 14 moved into a City of London social tenancy. One case subsequently withdrew, and the remaining cases are open.

### **Key Data**

38. Data relating to Q1 2022–23 and the period April 2018 to March 2022 can be found in Appendices 1 and 2

### **Corporate & Strategic Implications**

39. **Strategic implications** – N/A
40. **Financial implications** – N/A
41. **Resource implications** – N/A

42. **Legal implications** – N/A

43. **Risk implications** – N/A

44. **Equalities implications** – N/A

45. **Security implications** – N/A

## **Conclusion**

46. There have been three significant changes affecting Statutory Homelessness services since 2018: the introduction of the Homelessness Reduction Act (HRA); the COVID-19 pandemic; and the cost-of-living crisis.

47. The introduction of the HRA brought additional administrative burdens, however, the increase in approaches to the City of London was within the lower estimate.

48. The number of households/individuals approaching the City of London for advice and guidance has risen steeply, year on year since the introduction of the HRA.

49. The number of households/individuals in TA has increased in the same period, but at a rate slower than that of approaches.

50. The rate at which public bodies are referring to the City of London using the DTR mechanism introduced with the HRA has remained stable.

51. The number of approaches and households in TA have increased significantly, however, the number of cases reaching the prevention, relief and main duty stages has remained relatively stable.

## **Appendices**

- Appendix 1 – Statutory Homelessness Dashboard Q1 2022–23
- Appendix 2 – Statutory Homelessness Trend Data 2018–2022

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