

Operation Luscombe review

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1 Background

- 1.1 Operation Luscombe was initiated in 2018. It provides progressive and staged interventions aimed at reducing begging within the City of London. For those involved in begging who are vulnerable or destitute it provides an opportunity to engage with support services.
- 1.2 The operation is described by the City Police as using a “traffic light system with four stages, designed to deter individuals from begging, by seeking the appropriate support.” These stages initially (green) invite those begging to attend the “intervention hub”. Further begging results in the issuing of a community Protection Warning (amber), followed by a Community Protection Notice (red), which if breached is deemed arrestable (blue).
- 1.3 The “Hub” provides a physical setting that those with vulnerabilities who are engaged (when begging) by the police can be directed to attend. It allows for engagement with relevant support offers – such as homelessness and substance misuses services. Interaction with support is reinforced by the potential for criminal proceedings if individuals fail to engage and continue to beg. The Hub operates fortnightly and is currently organised by the City of London Police.
- 1.4 It is widely perceived that those who beg in the Square Mile are sleeping rough within the City, and that a welfare-based approach – be it social care, housing, homelessness support or drug and alcohol services – would be the responsibility and/or statutory duty of the City Corporation’s local authority services.
- 1.5 Eligibility for support by any local authority is tightly defined. Broadly those who are homeless in the Square Mile, who are resident, and - in some service areas – those who work in the City are likely to have some eligibility for support. In circumstances where people beg – or undertake other activities implying need – in the City, but are otherwise not connected, the access to service is likely to be very limited unless there are compelling risk or safeguarding reasons. Their support will exist in the area to which they have local connection.
- 1.6 Operation Luscombe operates in the context of a range of existing approaches to engage clients who would be a target for City homelessness, adult social care, and drug and alcohol services.
- 1.7 The City Police identify that begging mainly occurs on weekdays with 80 per cent of reports occurring between 8.00am and 4.00pm, Transport hubs and the Bishopsgate, Monument and Finsbury Circus area are the main focus of begging activity.
- 1.8 There is a general acceptance – substantiated by research – of the association of begging, alcohol and drug misuse.

- 1.9 The government is proposing a revised approach to tackle “nuisance begging” in the Criminal Justice Bill (see below).

2 Methodology

- 2.1 The records of those who received Operation Luscombe “tickets” over a six-month period, and those who attended the hub over an 18-month period were cross referenced with the CHAIN (Combined Homelessness and Information Network) database to help identify the cross over between begging and street homelessness.
- 2.2 CHAIN is used across London by homelessness services to record interactions with those seen sleeping rough. It does not record begging or the details of individuals whose rough sleeping is not verified by professional outreach teams.
- 2.3 This recording allows the identification of individuals who are currently – or have formerly been - sleeping rough and the location of that rough sleeping. CHAIN will identify if and where an individual has been accommodated.
- 2.4 It is an important feature of CHAIN that information is given freely and with the consent of those homeless to better support them and record street homelessness. It cannot be used as a tool that supports enforcement activity other than the work of homeless outreach team. The City of London Police do not have access to CHAIN and therefore cannot use it as a tool to inform their approach to individuals.
- 2.5 It should be noted that those who are street homeless will be given access to support and services in the local authority in which they sleep. There can be exceptions and complex eligibility criteria. However, this analysis has used location of rough sleeping, and engagement with relevant services, to indicate the local authority which would provide access to support services that are relevant and available to them.
- 2.6 If an individual is not on CHAIN, it is reasonable to assume that they are neither rough sleeping nor accommodated in hostels (or supported housing) for those who were street homeless anywhere in London.
- 2.7 While possible, it is unlikely that a person engaged with Operation Luscombe is sleeping rough for the very first time in the City and yet to be engaged with or seen by outreach services. The City’s outreach team operate daily in the Square Mile. It is possible - though considered unlikely - that a person may be rough sleeping outside of London (where CHAIN is not used) or in one of the outer London boroughs where outreach activity is less frequent and comprehensive and as a result have yet to be seen.

3 Analysis

- 3.1 This analysis looks at two groups:
 - i. Clients who received Operation Luscombe tickets between 02/03/23
10/08/23

- ii. Clients who had been ticketed and subsequently attended the Operation Luscombe Hub sessions (31 in total) between 30/04/2021 and 09/11/2022.

3.2 The disconnect in timescales means there is not a relationship in this data between the numbers ticketed and those attending the Hub.

Clients receiving Operation Luscombe tickets

3.3 Over six months 25 individuals received Operation Luscombe “tickets”. The totals below reflect the highest level of escalation they were at in that period:

- 8 - green
- 12 - amber
- 5 – red

3.4 Of these 25 individuals:

- 7 were sleeping rough at the time they were ticketed
- a further 13 had a CHAIN record – indicating they had been homeless at some stage - but no record of sleeping rough at the time they were ticketed
- five (20%) have no record on the CHAIN database and are assumed not to be currently or formerly rough sleeping anywhere in London.

3.5 Of the entire cohort ticketed, only seven (28%) out of 25 individuals would be considered entitled to/eligible for support services offered by the City Corporation or its commissioned providers. Therefore, for eighteen – the entitlement or opportunity for homelessness, accommodation, social service, GP registration or substance misuse support would exist elsewhere.

3.6 Of those sleeping rough when they were ticketed – only four were open to City Corporation services because they were sleeping rough in the Square Mile. One other individual was known to have accommodation in Morden but travelled to the City to beg and occasionally slept out. A further two of the rough sleeping ticketed individuals were London Borough of Tower Hamlets service users.

3.7 A further 13 people had a CHAIN record but were not sleeping rough at the time they were ticketed. CHAIN indicates the local authorities that are supporting these clients:

- Three individuals supported by the CoL and accommodated (two in Hackney and one in Southwark)
- Four supported by the London Borough of Tower Hamlets
- Two supported by the London Borough of Hackney
- Westminster (1), Southwark (1) and Haringey (1)
- One unknown

3.8 Eight of the thirteen had confirmed accommodation - none of which is in the Square Mile itself. Of the remaining five whose accommodation is unclear there was no clear evidence of current homelessness: four had not been sleeping rough for more than a year, with the remaining person last recorded rough sleeping in Hackney in January 2023 (five months before their OL ticketing).

Attendees of Operation Luscombe Hub

3.9 Over the period April 2021 to November 2022 there were 157 attendances to the Operation Luscombe Hub (the Hub) made by 100 individual people, of whom 71 attended on a single occasion and 29 attended more than once.

3.10 Of the 100 people who attend the hub, 28 had no record on CHAIN and are assumed not to be currently or formerly rough sleeping.

3.11 The remaining 72 have been recorded sleeping rough at some point. CHAIN identifies that:

- 33 were known to be sleeping rough at the time that they were ticketed
 - just 19 of whom were sleeping rough in the City of London.
 - 14 other people were sleeping rough in other local authorities - four in Westminster; four in Tower Hamlets and rest spread across five other local authorities
- 26 were known to be in accommodation at the time they attended the Hub
 - 16 of these people had a connection to the City
 - 5 were connected to Tower Hamlets
 - 5 people were each connected to one of five other local authorities
- One record is restricted

3.12 For a further twelve individuals who attended the hub, there is no clear record of current accommodation, but neither does any have a record of rough sleeping in the last 12 months. Three of these people have a known connection to City Corporation Services.

3.13 Of the 100 attendees to the hub (whether homeless or accommodated) 38 would be considered entitled to/eligible for support services offered by the City Corporation or its commissioned providers.

4 Equalities data

4.1 For those receiving a ticket or attending the Hub for whom there is no history of rough sleeping in London, there is no CHAIN record. Therefore recording and indication of protected characteristics is not available for that subset. CHAIN records equalities data where the concerned individual is willing to share that information. Not all protected characteristics are recorded. The equalities data below is based on clients engaged with Operation Luscombe who have been recorded on CHAIN.

4.2 For clients receiving a Luscombe ticket for the period recorded known to CHAIN:

- Total: 20
- Male 95%; Female 5%
- Age: 1 client aged 60-69; 0 clients aged less than 20 years; 60% aged 40-59
- Ethnicity: 11 (55%) white – British; 7 white – other; 1 Asian – Bangladeshi; 1 unknown

4.3 For clients attending the Luscombe Hub for the period recorded known to CHAIN:

- Total: 72
- Male 89%; Female 11%
- Age: 1 client aged 70-79; 3 aged 60-69; 0 clients aged less than 20 years; 56% aged 40-59
- Ethnicity: 42 (58%) white – British; 12 white – other; 2 Black – Black British; 1 Asian – Bangladeshi; 15 unknown

4.4 The annual CHAIN report for the City of London 2022/23 (latest full report available) – based on all rough sleepers contact by outreach services reports:

- Total: 469 people seen rough sleeping whose gender was known. This excludes 13 people whose gender was not known.
- Male 89.3%; Female 10.4%; Non-binary 0.2%
- Age: 60% aged 35-55 years, 13% over 55
- Ethnicity: 47.5% white – British; 28.4% white – other; 7% Black; 3.9% Asian

5 Gaps

- 5.1 Among those who were ticketed, or those who attended the Hub, there is no adequate formal indication or record of the prevalence of drug and alcohol misuse, mental ill health, physical ill health or other care needs.
- 5.2 CHAIN records only self-reported substance misuse and mental or physical ill health. It is not clinically defined and there are a number of factors that will impact on the accuracy of, willingness or motivation to declare, and completeness of data. Even where identified there is no indicator of severity – merely a yes or no measure. In addition - as set out above - not all Operation Luscombe clients are on CHAIN. For that reason, CHAIN has not been used to define these issues.
- 5.3 Despite this, it is reasonable to assume that many – if not most - of those begging will have substance misuses issues and support needs.
- 5.4 The presentation of need could be inferred from engagement with services at the Hub. Stakeholders engagement (see below) sought to identify if such needs were evident in the number of people helped because of attending the Hub. Put plainly – how many people were scripted (or engaged with treatment), how many people were accommodated, and how many had other support needs met.
- 5.5 These numbers were negligible. Of greatest relevance to this, will be the combination of those who are eligible for a service offer, and – of that number – those who are willing to engage with a service offer.

- 5.6 It is difficult to evidence a direct link between Operation Luscombe and the level of begging in the Square Mile. Begging is the consequence of and is influenced by many factors – many of which are external to the City.

6 Stakeholder feedback

- 6.1 Stakeholder interviews provided qualitative feedback from different service perspectives and sought – to a limited extent - to fill quantitative gaps about the impact of Operation Luscombe.

City of London Police

- 6.2 The City of London Police are very supportive of the Operation Luscombe model. It links to a strong sense that enforcement should only be deployed when other interventions have failed. There is also a concern that enforcement may push people away from support and relevant services.
- 6.3 There is a desire to reinforce the independence of the Hub from enforcement and policing, and a proposal that its operation should be organised by the City Corporation.
- 6.4 Police colleagues would like a wider range of service offer and support to be available at the Hub – suggesting health (GP/nurse), mental health and social services – and offers such as meals and showers.
- 6.5 The police wish to narrow their focus to enforcement and referral work leaving other welfare interventions and support to the City Corporation and its partners.
- 6.6 The police see the opening of the City Corporation's Rough Sleeping Assessment Centre (February 2024) as offering an opportunity to cease the Hub.

City Corporation Community Safety Team

- 6.7 The Community Safety Team (CST) reported Operation Luscombe as bringing a joint approach to tackling an issue using the range of powers and offers available. However, the complexities (possibly politics) and limitations of information exchange limit the extent to which the CST (and in their perception the police) can target individuals on the basis that they are coming to the City to beg and have no legitimate access to support in the City.
- 6.8 The CST reports providing an intermediary role in information and intelligence sharing, and became responsible for some set up functions and recording hub attendance. It is unclear whether this was ever formerly agreed – and there are now tensions given increasing demands on the CST that need to take priority.
- 6.9 The perception of the CST was that where enforcement was used, there was a high level of return to the City upon expiry, without specific action in response.
- 6.10 The CST identified the potential risk of enforcement being harmful in terms of access to service – but pointed to the use of the Community MARAC to manage that risk. For many, enforcement was not displacing them from a service offer, as no such offer is available to them in the City.

- 6.11 Broadly the CST felt a review of Operation Luscombe provides an opportunity to consider clarity on the strategy, approach and processes of enforcement. The proposal of new legislation in relation to tackle begging strengthens the need for a review of approach.
- 6.12 There is a potential duplication between the role of the Community MARAC and that of the Rough Sleeping Task and Targeting group. Each attract different levels of seniority in terms of police representation, that may limit the scope for more strategic operational planning.

City of London Homelessness and Rough Sleeping Service

- 6.13 The City Corporation's Homelessness and Rough Sleeping Service (the service) considered the Operation Luscombe Hub to be of limited value. They were unable to identify anyone accommodated as a consequence of attending the Hub. The potential for outcome was considered limited (in terms of their target client group) and not best use of commissioned resources.
- 6.14 The service's offer/eligibility and funding are based on delivery to those eligible for support by the City Corporation. The experience of the service was that only a minority of those attending the Hub (or ticketed) were sleeping rough in the Square Mile. Therefore, their only role would be to direct them to service in the authority in which they are homeless (be it on the street or in hostel/temporary accommodation).
- 6.15 In terms of begging, the service is focussed on reducing the begging of those who beg and sleep rough in the City. Therefore the service's perspective and ambition for any Hub is focused on those who sleep rough, and not a wider street population. The service acknowledged that the identify of know rough sleepers, and those known not to be or homeless elsewhere, is not shared with the police routinely.
- 6.16 The perception of the service is that police colleagues are not fully aware of the full extent of offer and support targeted at those rough sleeping in the Square Mile. Many replicate elements that are present or would be desired in the Hub (by police colleagues) but specifically target street homelessness.
- 6.17 It was suggested that the focus of Operation Luscombe by the police had drifted from enforcement to an over reliance on the sense that welfare-based approaches will reduce begging. This conflicts with the service's sense that enforcement – where targeted appropriately – can drive individuals into service.
- 6.18 Despite reporting limited outcomes, the service welcomed the focus Operation Luscombe has brought to partnership working and to tackling begging.

Homeless Outreach Services

- 6.19 The City Corporation's commissioned provider of street homeless outreach services is Thames Reach.
- 6.20 From the perspective of their service delivery and outcomes, Thames Reach felt Operation Luscombe is delivering limited impact. They described the Hub as offering

“very little for outreach” in terms of their target client group, but referenced to “odd examples” of clients attending who refused to engage on the streets.

- 6.21 The outreach team consider a having an “enforcement strategy” to be useful in working with targeted clients.
- 6.22 They considered a Hub could offer more, creating a low threshold, multidisciplinary space with the weekly health van co-located. This should be weekly. They acknowledged this would only deliver for those eligible for City support – with others directed away from the City to the areas in which they have a support entitlement.
- 6.23 The outreach service is keen to ensure clients see it as independent from “the council” or the police. It acknowledges the limitations, and operational tension, of information sharing.
- 6.24 The service felt there could be a stronger role for the Community Safety Team in terms of complex clients. It also acknowledged that there could be improved working with the police, and suggested a strategic police lead that could direct the strategy (with partners) for complex individuals and areas.
- 6.25 The service delivers eight outreach shifts weekly – offering daily coverage.

Drug and Alcohol Services

- 6.26 The Corporation’s commissioned provider of substance misuse services is Turning Point.
- 6.27 Turing Point colleagues report assessing two clients at the Operation Luscombe Hub. Neither engaged with treatment and there has been no further contact with the service.
- 6.28 Turning Point considered a close collaboration with partner services essential to tackling substance misuse among the street homeless population. They see the banner of Operation Luscombe as a potential to develop that, but reported their presence at the Hub as “not being productive”.
- 6.29 The provider pointed out its weekly joint patrolling with street homelessness services, weekly drop in at the City’s Portsoken Community Centre, and weekly attendance alongside the homeless health van (see below) as offering alternative – and in terms of working with outreach more effective - access points for welfare support.

7 Other wellbeing provision and aligned services and operations

- 7.1 The City Corporation commissions a number of services to support those homeless on the streets of the Square Mile. These are:

Accommodation pathway

- 7.2 The City Corporation has access to a pathway of accommodation to provide appropriate support and access to emergency accommodation. It includes a 30-bed

hostel for those with complex needs (LB Southwark); the Lodge projects providing 22 beds and a further 20-bed lower needs hostel (Southwark).

Rough Sleeping Assessment Centre

- 7.3 A dedicated Rough Sleeping Assessment Centre (Snow Hill Court) opened in the Square Mile early in 2024. It will provide 14 emergency bed spaces, and a place to assess immediate and on-going needs. The target duration of stay is now more than 28 days.
- 7.4 Snow Hill Court will not be a day centre. It is not intended to provide open access. It will operate in conjunction with outreach services – who will be the only referring service. It will provide opportunity for limited coworking arrangements, but lacks the space required for a wider welfare offer.

Street homeless outreach

- 7.5 Commissioned outreach services (delivered by Thames Reach) provide eight shifts weekly, and operate on every day. The service is focused on those who are street homeless. Further support is provided by commissioned community patrolling (delivered by Parkguard) so support access to clients in difficult settings and situations.
- 7.6 Thames Reach participates in a weekly joint patrol with substance misuse outreach workers (see below) and supports delivery of the weekly City Wellbeing Project (see below).

Substance misuse outreach and drop in

- 7.7 Substance misuse services – including securing access to treatment and prescribing – are delivered by a commissioned provider (Turning Point). Their rough sleeping team delivers a joint patrol with the City’s homeless outreach service every Friday morning to target those in need of support.
- 7.8 Turning Point also delivers a weekly client drop in every Tuesday at the Portsoken Community Centre.
- 7.9 The contract allows for ad hoc outreach targeting where that is an agreed strategy.

Clinical Wellbeing Clinical Van

- 7.10 A mobile primary care clinic is deployed weekly (on a Wednesday) at Liverpool Street to provide outreach health care to street homeless people. The deployment is coordinated by City of London and jointly delivered by NHS East London Foundation Trust (ELFT) via Greenhouse (GP) surgery, Turning Point (substance misuse), f Thames Reach outreach workers and Groundswell peer workers.

Specialist rough sleeping social worker

- 7.11 A specialist social worker is embedded in the City Corporation’s Homelessness and Rough Sleeping Service to carry out all statutory social work functions for those who are sleeping rough in the square mile. The post has a flexible, relationship-based approach to manage risk, safeguard vulnerable people and promote positive

outcomes. The aim is to ensure all those entitled to adult social care support in response to additional needs (and the duties of the Care Act) receive appropriate care and support, and case co-ordination.

Severe Weather Emergency Protocol (SWEP) accommodation

- 7.12 Severe Weather Emergency Protocol (SWEP) is a set of measures triggered by weather conditions which are considered an acute risk to the health of rough sleepers. This includes extreme heat and cold.
- 7.13 Activation results from an alert by the Greater London Authority – in line with a pan-London protocol. In cold weather the City Corporation's SWEP is activated when there is a single night forecast of zero degrees (or below) anywhere in Greater London. It will remain until nighttime temperatures rise above freezing. The City Corporation adopts a local approach whereby deactivation is stalled if it makes more logistical and operational sense to extend a SWEP activation – over a weekend or bank holiday for example.
- 7.14 The City Corporation utilises 11 spaces available in its accommodation pathway (all in communal or repurposed rooms) plus B&B bookings and use of discretionary temporary accommodation to ensure that there is an offer for anyone who will come off the street.
- 7.15 Over the last 3 years The City Corporation has averaged 30 nights of Cold Weather SWEP activation per winter period.
- 7.16 All clients accessing accommodation via SWEP bedspaces are assessed by the City Outreach Service and supported to enter the CoL accommodation pathway if eligible for services. The City Corporation operates an 'In for Good' principle dictates that local authorities operating under the GLA SWEP protocol should aim to retain all rough sleepers placed into accommodation during SWEP periods until there is a support plan in place to end their rough sleeping.
- 7.17 Hot Weather SWEP deviates from the cold weather model by not focussing on accommodation at night. Instead, outreach teams work to get rough sleepers into cool daytime spaces.

8 New legislation - Criminal Justice Bill: Nuisance begging and rough sleeping

- 8.1 The Government is going to replace the Vagrancy Act 1824 with a suite of modern replacement powers “to enable the police and local authorities to respond to begging and rough sleeping where it causes nuisance to the public, including by obstructing shop doorways and aggressively begging by cash points”.
- 8.2 Police forces and local councils will be given the tools they need to help move vulnerable individuals off the streets and direct them to the appropriate support they need, such as accommodation, mental health or substance misuse services.
- 8.3 The Government reports the Bill will:

- a) Prohibit begging where it is causing a public nuisance, such as by a cashpoint, in a shop doorway, on public transport, approaching people in their cars at traffic lights, and any broader incidence that cause harassment or distress. Where such situations arise, it would be for the police and/or local authorities to determine the appropriate response, be it a move on direction, prosecution for a criminal offence, issuing a nuisance begging prevention notice or applying to the court for a nuisance begging prevention order.
- b) Introduce a new offence targeted at organised begging, which can be facilitated by criminal gangs to obtain cash for illicit activity.
- c) Introduce powers for the police and local authorities to address rough sleeping where it is causing damage, disruption, harassment or distress, or a security or health and safety risk, such as by obstruction of fire exits and blocking pavements. Where such situations arise it would be for the police and/or local authorities to determine the appropriate response, be it a move on direction, issue of a nuisance rough sleeping prevention notice or applying to a court for a nuisance rough sleeping prevention order which can help those who are genuinely homeless and with complex needs be directed to appropriate support.

9 Conclusions

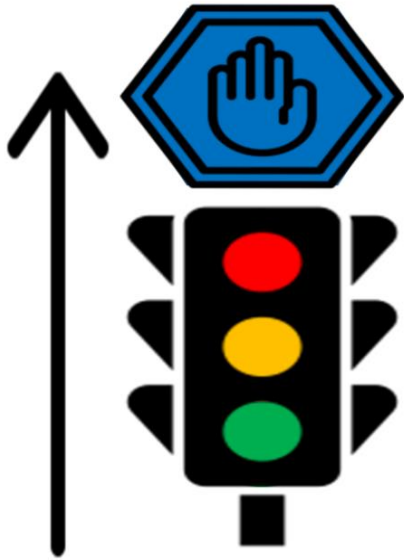
- 9.1 The conclusions set out are those of the report author
- 9.2 In its concept, Operation Luscombe has been a valuable project in driving a shared approach to begging and recognising the complexity of cause and response, and the role of many partners within that.
- 9.3 The ticketing approach of escalation provides a reasonable and balanced approach to use of enforcement with the opportunity for behavioural change. However, it is not a mandate to seek support and is not linked to monitoring of hub attendance.
- 9.4 Ticketing is more effective as a system of fair warning of the enforcement consequences of continued begging, than as a means to reduce begging, homelessness, or drive individuals to take up support services.
- 9.5 The Hub element of Operation Luscombe is problematic. It provides a reassurance that a welfare offer is available, but the reality is that the number entitled to support is limited, engagement with support is very low, and impact negligible. It is not reducing begging or rough sleeping. It also seeks to duplicate welfare offers that are better targeted through other operational approaches that exist.
- 9.6 For police colleagues there is an over reliance on the belief that those begging have support needs that can or would be met by the City. This underpins the justification of the Hub.

- 9.7 Other welfare support is available and more effectively targeted at those known to be sleeping rough in the Square Mile or supported by City services. It is possible that there is limited knowledge or confidence in these.
- 9.8 The City does not have a day centre. This is not a model that will be delivered in the Square Mile – or is recommended. But the opportunity to use day centres proximate to the City does not seem to have been actively considered.
- 9.9 The concern that enforcement may displace individuals from their support is not well founded in the City. For the majority who encounter Operation Luscombe there is no entitlement to support from City Corporation services, so no risk of displacement.
- 9.10 Many who beg in the City – regardless of whether they have support needs or not – are coming to the City to beg. This behaviour is manifesting away from the areas in which the majority have a connection or entitlement to services.
- 9.11 The ability of the police to target those who are begging in the City - but who are not homeless or a focus for City Corporation services - is hampered by the inability or unwillingness to share data and information with them to enable targeting.
- 9.12 There is no consensus or strategic approach to tackling begging, and the role of and use of enforcement as an element of that. Political appetite for, and interest in, enforcement-based approaches is limited – potentially due to an assumption that those who beg are destitute and street homeless.
- 9.13 The ambition held by all for a partnership based approach is very credible, but it is not delivering.

10 Recommendations

- 10.1 The ticketing element of Operation Luscombe should be retained. Where a CPN is issued as a result of a red ticket, and on expiry an individual returns to the City, it is recommended that an expedited approach is adopted to deter begging, rather than starting afresh.
- 10.2 The Hub should cease. It is an ineffective use of resource.
- 10.3 The Hub should be replaced with a dedicated role. This role would act as an interface between the CoLP and the City's Homelessness and Rough Sleeping Service. The role would allow for the identification of those known to rough sleeping services – and the location of that offer of support. It would give assurance that those sleeping rough in the City are engaged by the support services available to them. It would also support the identification of those whose support entitlement is outside of the Square Mile, or for whom there is no identification of rough sleeping. The role could also enable and identify appropriate joint patrolling. This role could sit within the Community Safety Team.
- 10.4 The Community MARAC should be used to refer and agree a strategy for individuals where there are issues of risk and anti-social behaviour, and for whom a multi-agency approach with an agreed and shared strategy is required.

- 10.5 Existing welfare focused provision could be further developed. The timing of the clinical welfare van could be adjusted to improve take up. It should be co-located to physical premises that would allow a wider service offer and engagement. Premises could be identified, and potentially funded, in collaboration with the City's Business Improvement Districts, but needs to be proximate to need. Its routine presence would give assurance to CoLP that there is a setting to which those they engage on the streets can be directed.
- 10.6 The City Corporation and CoLP should develop an enforcement strategy, accompanied by clear operational practice in which roles, process and aims are shared and understood. This should cover begging, and the role enforcement can play in breaking the cycle of rough sleeping.



BLUE

This is issued when the individual breaches their red ticket / CPN. The individual may be arrested or issued with a summons.

RED

This is the equivalent of a Community Protection Notice (CPN). This is issued if the individual breaches their CPNW. The CPN is bespoke to the individuals but generally bans the individual from the whole of the City of London. These are valid for 3 months. The individual can be prosecuted if they are seen to breach the CPN.

AMBER

This is the equivalent of a Community Protection Notice Warning (CPNW). It is an official warning letter written to the individual with a date and signature. These are valid for 12 months. The warnings can be bespoke but generally state the individual should not be seen begging or littering. They are subject to a Community Protection Notice if caught breaching requirements over the next 12 months. The individual is also expected to attend the monthly Hub.

GREEN

An invitation to the hub
Warning issued to stop begging. A warning before the official warning.