

Committee: Homelessness and Rough Sleeping Subcommittee Community and Children’s Services Committee	Dated: 04/03/2024 04/07/2024
Subject: Future Planning for Severe Weather Emergency Protocols	Public
Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?	1,2,3,4,10
Does this proposal require extra revenue and/or capital spending?	N
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, Community and Children’s Services	For Decision
Report author: Will Norman – Head of Homelessness Prevention and Rough Sleeping	

Summary

This report sets out the background to how and why the City of London delivers a Severe Weather Emergency Protocol (SWEP) and the methodology currently in use. The report describes the costs of delivering SWEP and places this cost in the context of the changes we are seeing in the sector regarding expectations and demand pressures. The report provides potential options designed to meet emerging demand and future proof SWEP delivery.

Three options are set out for Members to consider: a) changing nothing; b) increasing the budget and retaining the existing delivery model; c) increasing the budget and redesigning our SWEP delivery model. Appendix 1 sets out the cost of SWEP for 2023/24 and describes a potential option C. This appendix contains information which is commercially sensitive so can therefore be found in the non-public section.

Appendix 1 has been updated from the version seen by the Homelessness and Rough Sleeping Subcommittee on 4 March 2024 to include known winter SWEP costs for 2023/24. The Subcommittee supports option C and recommends this option to Community and Childrens Services for consideration. The cost of delivering option C, or similar, has been included in the mid-term financial planning process recently undertaken by Chamberlains.

This report references the following priority areas from the 2024–27 Homelessness and Rough Sleeping Strategy:

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

Recommendation

Members are asked to:

- Consider the recommendation made by the Homelessness and Rough Sleeping Subcommittee to progress option C.

Main Report

Background

1. SWEP is a set of measures triggered by weather conditions that are considered an acute risk to the health of rough sleepers. Historically this involved only cold weather. More recently, hot weather is also included and, in rare cases, storms and high winds. SWEP is not a statutory requirement, however, over the last decade it has become a standard operating procedure for local authorities.
2. Local authority SWEP compliance, budget and capacity has witnessed notable change over the last five years. 2017/18 was the first year that the Greater London Authority (GLA) published annual SWEP guidelines, and approaches across local authorities varied enormously. February and March 2018 saw the 'Beast from the East' with night-time and daytime temperatures around or below zero. The risk to life among rough sleepers was significant and local and Pan-London capacity was quickly exhausted.
3. 2018/19 saw the introduction of the 'In for Good' principle. This asks local authorities to keep anyone coming into emergency accommodation off the street until such a time as a viable plan to end their homelessness has been formulated. While widely recognised as being a helpful objective, 'In for Good' can effectively extend a SWEP stay beyond the deactivation day, for days and potentially weeks or months.
4. The history of activation protocols has also changed. Prior to 2017/18, Homeless Link advice was that local authorities should activate SWEP when the weather was forecast to drop below zero degrees for three consecutive nights. This advice is still widely followed outside London, particularly in rural areas. The first GLA protocol of 2017/18 suggested that a single night forecast of zero degrees was more reliable and provided better safeguards for London's three larger rough sleeping populations. In 2018/19 the GLA adopted a co-ordination role on behalf of all 33 London authorities for activations and, to help achieve this, adapted the activation criteria further to a single night forecast of zero degrees anywhere in Greater London.
5. As part of its SWEP commitment, the GLA commissions a Pan-London SWEP project, which accepts referrals from all London local authorities. The expectation is that local provision will be exhausted before Pan-London SWEP is accessed.

6. Hot weather SWEP was first introduced during the heatwaves of summer 2021/22 where record temperatures in excess of 40 degrees were recorded in central London. 2022/23 was the first year that Hot Weather SWEP was formalised, and the GLA published a RAG-rated activation framework based on UK Health Security Agency guidance.
7. Hot Weather SWEP deviates from the cold weather model by not focusing on accommodation at night. Instead, Outreach teams work to get rough sleepers into cool daytime spaces.
8. An earlier draft of this report was seen by the Department of Community and Children's Services Departmental Leadership Team meeting on 17 January 2024 and the Homelessness and Rough Sleeping Subcommittee on 4 March 2024.

Current Position

9. The City of London has a SWEP document that is reviewed annually, with key data and findings shared with relevant operational and strategic groups and the Homelessness & Rough Sleeping Sub-Committee.

City Cold Weather SWEP

10. Activations are made by the GLA by mid-morning on the day preceding the night-time forecast and immediately relayed to commissioned services and stakeholders. Along with other local authorities, the City will not normally deviate from GLA protocol, regardless of the weather forecast in the Square Mile. Zero degrees in Barnet could mean 4 degrees in the Square Mile.
11. SWEP is deactivated in a similar way, but we are more likely to follow our own protocol if it makes more logistical and operational sense to extend a SWEP activation – for example, over a weekend or bank holiday.
12. The 'In for Good' principle in the City is taken to mean until such a time as a rough sleeper has a Credible Service Offer (CSO). The accommodation resources available each year vary depending on the assets available to us. This winter we had 11 spaces available in our Pathway (all in communal or repurposed rooms) plus B&B bookings and use of discretionary temporary accommodation.
13. Over the last three years we have averaged 30 nights of SWEP activation per winter period (taken to be 1 November to 31 March, although April has seen SWEP in the past). In 2022/23 there were 34 nights of SWEP activation, and we achieved 53 stays for 50 unique individuals.
14. During winter 2023/24 we saw 18 nights covered by SWEP activation and 64 individuals assisted.

City Hot Weather SWEP

15. Hot Weather SWEP focuses on access to advice, guidance and cool spaces during the day. Rough sleepers with health conditions are less able to take precautions to safeguard themselves, so there is an additional emphasis on health needs assessment.
16. Hot Weather SWEP guidance uses the Heat Health Alerts, issued by UK Health Security Agency, which alert us to what impact the heat could have. There are four alert levels:
 - Green: When there is expected to be minimal impact on health (and no alert will be issued)
 - Yellow: When people who are more vulnerable may struggle to cope. This may be issued when temperatures are forecast to reach 30°C for a couple of days
 - Amber: When the impact from the heat is likely to be felt across the entire population. This may be triggered when temperatures are forecast to approach 32°C
 - Red: When there is significant risk to life, for the entire population.
17. Activations are sent from the GLA in the same way as cold weather activations. Yellow alerts (not an activation) are common and only require advice, guidance and signposting. Amber and Red activations require access to dedicated 'cool spaces' during the day. Last summer we took the discretionary step of extending cool space provision into the evening for Red activations (not required).
18. Summer 2023 (which was cooler than expected) saw 19 days under Yellow alert and seven days under Amber activation. During 2022, which pre-dates the first dedicated Hot Weather SWEP protocols, cool spaces were provided on two separate occasions. Applying the UK Health Security Agency activation criteria retrospectively, two of these activations would have been Red.

Challenges

Expectations upon local authorities

19. As detailed above, prior to 2016/17, SWEP was managed locally with guiding principles set out by Homeless Link and the GLA. Incremental steps taken over recent years have increased expectations from regional bodies and central government. Rough Sleepers Initiative (RSI) funding has opened local service delivery up to greater scrutiny and reporting. Every autumn each local authority is asked to share its SWEP arrangements in advance. Individual borough SWEP performance data is widely shared.
20. Hot Weather SWEP requires two sets of arrangements meaning we are in a state of perpetual planning and review. 'In for Good' is a valuable principle for capitalising on SWEP activations and important learning arises from each season, however, the delivery of both protocols is increasingly resource intensive.

Fluctuating demand

21. SWEP demand is difficult to predict, both during an activation and in the preparation stages of planning. Single night activations on or around zero degrees somewhere in London can result in no rough sleepers accepting a SWEP offer. A week of sub-zero night-time temperatures combined with snow or freezing rain can see SWEP capacity quickly exhausted. Delivery models which meet the needs of both while also returning value for money are hard to achieve. Containing our SWEP offer within our existing pathway makes costs easier to track.
22. Differences between boroughs in rough sleeping numbers has a knock-on effect for the City. The second SWEP activation of winter 2023/24 saw the GLA-funded Pan-London SWEP project near capacity. A risk emerges of London-wide demand exceeding combined local and Pan-London provision.
23. The increasing probability of severe weather (hot and cold) and rising rough sleeping numbers present a challenge to current and near future planning.
24. Seasonal projects designed to operate continually through the winter can be helpful in offering additional baseline capacity, but they have limitations as to what they can offer should temperatures drop into SWEP criteria. Spaces will need to be held back to accommodate the extra demand created by the SWEP offer.
25. Despite obvious discomfort created by cold weather, not every rough sleeper will except an offer of SWEP accommodation. Our Outreach teams are determined in their attempts to restate SWEP offers. Data from recent activations tells us that approximately 80% of City rough sleepers accept SWEP during long activations (over a week). Depending on the measure used, this equates to between 24 and 37 SWEP spaces required for a lengthy activation at current rough sleeping levels.
26. Should rough sleeping numbers decline, the number of SWEP spaces required would track that figure. Short activations would require fewer spaces.

Cost

27. Prior to 2017/18 there was no dedicated SWEP budget for the provision of emergency accommodation. A £10,000 budget was used to fund an annual winter awareness campaign aimed at the public and businesses. Printed materials advertised StreetLink. SWEP provision was offered at no cost by existing commissioned providers and the only additional costs were B&B placements if this was exhausted. The winter promotional campaign has been discontinued and the budget increased to £20,000 from within the local risk budget.
28. The severe winter of 2017/18 saw most local authorities exhaust their core provision, and contingency plans were widely mobilised. The City temporarily

increased the burden on existing providers to ensure that no one was left out. To manage risk, additional funding was supplied to providers to boost security and night staffing cover.

29. During the COVID-19 pandemic, providers came to the aid of commissioners more than once to expand, modify and extend service provision to meet the 'Everyone In' challenge. Funding from the RSI often made this possible. Providers now face requests from across London for SWEP solutions and demand on them has increased significantly.
30. More detailed costs for delivering SWEP in 2023/24 can be found in Non-public Appendix 1.

Resources and infrastructure

31. Traditional SWEP responses use spare capacity in existing supported accommodation pathways. Spare offices, vacant rooms and communal spaces can all be used. The total number of 11 spaces this year is indicative of the spare capacity within our pathway rather than the level of need found in the rough sleeping population. If we had more spare capacity, we would use this to increase the size of our core SWEP offer.
32. The City's flexible SWEP offer uses hotel rooms so, should demand exceed the core 11 space allocation, SWEP offers remain at the Outreach team's disposal throughout any activation.
33. Buildings and spaces that could be used for surge or tier-two SWEP are hard to find and mobilise. The City would require delivery partners to operate such a service, and it would need a model that could be mobilised at pace with minimal preparation.
34. Hot Weather SWEP presents a distinct set of challenges. 'Cool spaces' must be available during daytime hours (and into the evening for a Red activation), accessible to a rough sleeping client group, and appropriately staffed. During the heatwaves in 2022, a conference room in the Guildhall North Wing was hastily commandeered (but not used). This is not seen as a sustainable solution.
35. The City Outreach team are doubly busy during winter under normal conditions and SWEP adds additional pressures. The more integrated we become into wider social care, community safety and health systems, the more demands there are of the Outreach team to engage with various initiatives, schemes and projects.
36. Sub-regional and multi-borough SWEP solutions do not currently exist but could in the future. While a SWEP offer distant from the Square Mile is less likely to prove effective, a more limited SWEP service shared with immediate neighbours is viable, subject to funding.

Procurement

37. The increase in the cost of delivering SWEP, unpredictable sources of funding and fluctuating demand has created challenges to securing compliant procurement processes. Contract variations can be used for existing providers, where possible, and open market tenders are required for new and novel pieces of work. The annual cycle of review, plan and commission is inefficient, resource intensive and introduces unnecessary risk. Short-term and late notice grant funding awards present technical and resource challenges for procurement and legal colleagues.

Options

A. Change nothing

38. It is possible to continue to deliver SWEP in the way we currently do. This will necessarily limit the scope of our SWEP offer to what can be contained within the Homelessness & Rough Sleeping local risk budget. The new Rough Sleeping Assessment Centre mobilises in early 2024 and this will offer an additional two safe spaces. On this basis 10 to 14 spaces within our existing pathway is sustainable. Assuming that contract terms can be agreed, Hot Weather SWEP at the Dellow Centre could continue to be the solution. £50,000 has been set aside from our Local Risk for the 2024/25 period.

Benefits

- Represents a continuation of our current practice, so is relatively easy to arrange.
- Costs are rising but still represents the cheapest way of delivering SWEP.

Risks

- In 2023/24 costs exceeded the £20,000 budget set aside for SWEP but were contained within the Homelessness and Rough Sleeping local risk budget.
- Trends seen over the last six years indicate that costs and demand are more likely to increase than remain the same or reduce. This puts the larger amount (£50,000) set aside for 2024/25 under pressure.
- The City is less prepared for known factors such as climate change, fluctuating rough sleeping numbers and public health crises.
- Capacity is arbitrarily limited to available space within the existing pathway. Meeting demand over and above this will require in-year emergency planning.
- Long-term procurement challenges created by rising aggregated spend and repeat contract variations.

B. Increase budget to extend existing measures

39. Continuing to deliver the existing year-round SWEP offer from the existing Homelessness and Rough Sleeping budget has required the budget to be profiled differently for FY2024/25. Going forward should this approach be repeated, funding for other service delivery areas or interim/agency posts could

be affected. The Homelessness and Rough Sleeping local risk budget needs to increase to reflect current costs plus the need to be flexible to extend current measures to account for worsening weather conditions, increasing rough sleeping numbers and rising expectations on Outreach teams.

40. Extending current measures could mean different things – additional B&B use, spot purchasing voids in services commissioned outside the City of London pathway or procuring temporary accommodation.
41. Extending existing measures should also include additional Outreach resource to co-ordinate SWEP activity.

Benefits

- Builds on existing measures so is relatively easy to deliver, depending on scope and complexity of expanded offer.
- Covers realistic cost of current SWEP delivery and gives scope to expand offer to create a more comprehensive solution.
- Addresses some of the emerging need identified in option A.
- Introduces efficiencies which should limit the need for in-year emergency planning (in the event surge or tier-two capacity is included).
- Improved service delivery continuity for the commissioned Outreach team.

Risks

- Additional in-year planning will be required if capacity is exhausted.
- Additional use of B&Bs and temporary accommodation introduces risk and stretches support span of existing commissioned services.
- Procurement challenges remain.

C. Increase budget and develop new SWEP model

42. Option C represents a more comprehensive rethink of how we deliver SWEP. It is designed to consider current pressures, learning from previous models and future demand.

43. Current SWEP delivery is based around the principle of safeguarding life and wellbeing during severe weather. Over time, it has also become increasingly important as a method for capturing rough sleepers previously overlooked or ineligible for assistance. SWEP can be a catalyst for change given the opportunity it presents Outreach teams to reframe support offers and engage hard-to-reach individuals. An increased SWEP budget combined with more comprehensive internal partnership work could create a year-round SWEP offer which is resilient to current and future pressures. The components of this offer could be:

- A two-stage or phased model using a commissioned provider and dedicated space to complement the core offer found within the Pathway
- A building-based resource within the Square Mile to locate a regular SWEP service

- A dedicated 'playbook' with corporate level buy-in to ensure that resources are allocated for more severe or lengthy activations
- A model that can be mobilised to support other critical and business continuity risks such as hostel evacuations
- A year-round model adapted for winter/summer SWEP activations
- The potential for co-ordination shared with the City of London Resilience Forum
- Access to centrally sourced volunteers and resources to support planning and delivery
- Procurement solutions sought as required – for example, City of London SWEP provider contract
- Additional Outreach capacity during winter.

Benefits

- Flexible capacity is integrated into the plan, creating a high degree of confidence that any level of SWEP demand can be met
- The 'playbook' can be mobilised for other contingencies – critical service failures, public health emergencies, etc. This offers additional value.
- Link to Resilience Forum strengthens the approach and mitigates the risk held locally within the Department of Community and Children's Services
- Procurement on a more stable footing and reduced contract compliance risk
- Improved efficiency within the Homelessness and Rough Sleeping Team – less officer time spent organising and troubleshooting
- Improved business continuity for the Outreach team – ability to remain focused on objectives.
- Year-round preparedness and resilience.

Risks

- Greater cost and complexity
- Challenges remain in sourcing suitable accommodation within the Square Mile and keeping that available year on year
- This option would require additional funding being agreed for 2025/26 onwards.

Corporate & Strategic Implications

44. **Financial implications** – SWEP costs are currently met within existing local risk budget. However, future SWEP demands led by weather events or expanded delivery models will increase costs.
45. **Resource implications** – N/A
46. **Legal implications** – N/A
47. **Risk implications** – N/A
48. **Equalities implications** – N/A
49. **Climate implications** – there are no implications arising from this report or the measures contained within the protocol and Appendix documents. However, this SWEP protocol is directly related to year-round weather events.
50. **Security implications** – N/A

Conclusion

51. The City of London has a SWEP protocol with two appendices which cover cold and hot weather arrangements respectively. These are reviewed and updated annually.
52. SWEP demands placed upon local authorities are increasing as expectations upon local authorities and rough sleeping numbers increase. This creates a number of challenges, including budget and resource pressures.
53. Sustaining the current SWEP approach of a core offer sourced from within our Pathway plus additional temporary accommodation and hotel room bookings can be contained with the local risk budget.
54. Expanding that model to create more confirmed capacity ahead of each winter or a more fundamental redesign of our SWEP model to match forecast future demand will require an increase in budget.
55. Option C is the preferred alternative SWEP model. This option has been considered by the Homelessness and Rough Sleeping Subcommittee and is recommended to the Community and Childrens Services Committee for consideration.
56. The increased cost of delivering Option C has been included in the medium-term financial planning process.

Background Papers

- City of London Severe Weather Emergency Protocol 2023/24

Appendices

- Non-public Appendix 1 – Projected SWEP costs 2023/24 (updated) and estimated costs for SWEP model option C.

Will Norman

Head of Homelessness Prevention and Rough Sleeping

T: 0207 3321994

E: will.norman@cityoflondon.gov.uk