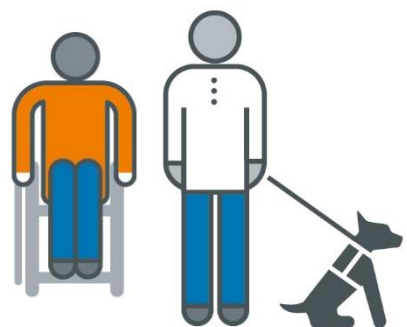


**An overview of arrangements Safeguard
Adults with Care and Support needs who
are Rough Sleeping or Homeless in the
City of London**



CITY OF LONDON CORPORATION

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

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Introduction

This report is intended to provide an overview from an Adult Social Care perspective of the work being done in the City of London (CoL) to safeguard those 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).

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.

The structure of the People Directorate enables Heads of both services to work closely together as part of the Adults Senior Management team under the Assistant Director for People.

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.

As a local authority the City of London has safeguarding duties under section 42 of the Care Act 2014 towards adults with care and support needs.

While the report will go into some detail around formal legislative safeguarding arrangements, it also covers wider arrangements in place to provide support to meet the ongoing needs of adults who have experienced homelessness or rough sleeping.

Assessing and meeting the needs of adults who are Rough Sleeping or Homeless.

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.

Since the introduction of the role in 2021 assessments are carried out by HRS social worker, although there are social workers within ASC who are experienced in this area and will also undertake assessments where required.

The following table shows the number of assessments undertaken since April 2021 and in how many of these the adult was found to meet the Care Act eligibility criteria.

Year	Total Assessments	Eligible	Not Eligible	Unable to complete
2021/22	20	14	6	
2022/23	18	11	5	2
2023/24	11	7	4	
2024 Apr to Dec	5 *	3	2	

*An additional 5 assessments currently allocated.

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The above data shows a higher number of assessments in the initial 2 year post pandemic time period. Along with the impact of the pandemic itself, the high figures could also be attributed to the establishment of the temporary assessment centre at Carter Lane and the introduction of the HRS social worker post.

There is a significant drop off in the number of assessments since that period which could have been impacted by the changes in the assessment centre, its systems, locations, and personnel, as well as the lessening impact of the pandemic. 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.

Additionally, there are a number of challenges in assessing the needs of rough sleepers, refusal of assessment or to engage is common and often requires a longer-term approach of relationship-based interactions to build trust with the adult. Having a dedicated social worker embedded within HRS can help facilitate this. Locating the adult can also be problematic given the transient nature of many rough sleepers and can lead to being unable to undertake to complete assessments.

The below table shows the outcomes immediately following the assessments,

Year	Total Assessments	Care and Support Plan/immediate Services	Services offered but declined	Referral to other agency	No further Action/case closure
2021/2022	20	12	2	3	3
2022/2023	18	7	1	4	6
2023/2024	11	6	0	3	2
2024 Apr to Dec	5	3	0	0	2

Approximately 52% of all assessments led to support being put in place, only in 2022/23 did this figure drop below 50%. An additional 3 adults over the whole period were offered but declined services. Of the remaining 23 adults 10 agreed to be referred on to other agencies which included,

- Drug and alcohol support
- Other Local Authorities
- Mental Health services
- Accommodation Services
- Asylum Seeker Support Services
- Migrants Organise, charity that supports those seeking asylum.
- Learning, training, and employment support

Long Term ASC support

ASC provide long term support for adults who have experienced rough sleeping and homelessness. The majority of these adults are in accommodation-based support such as supported living schemes and residential care.

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Supported Living

Supported living is housing with individual tenancies where support and/or care services are provided. The accommodation is normally funded via housing benefit with ASC funding the support elements, however, in some circumstances ASC also funds the accommodation.

City of London ASC service spot purchases supported living scheme placements to provide accommodation-based support for people to attain or retain their independence.

The following shows the total number of supported living placements funded by ASC breaking down the figures to show the numbers who have experienced homelessness or rough sleeping.

Total number Supported living placements across all ASC	20
Former Rough Sleepers	10
Previously homeless but not rough sleeping	1
No history of homelessness	9

The above table shows that over 50% of all ASC funded supported living placements are for people who have experienced homelessness or rough sleeping. This appears to be indicative of the City of London's disproportionately high levels of rough sleeping in comparison to its housed population, along with the systems and appetite to meet the needs of this cohort.

Residential Care

Residential care means long-term care and support provided in a care home. It's for people who need substantial help with their personal care and can also include nursing homes for those with higher medical needs.

As of 31 December 2024, there were 26 permanent residential care placements open to ASC, 10 (38%) of which were for adults who previously experienced rough sleeping or homelessness.

A Deprivation of Liberty Safeguard is in place for 4 of these adults under the Mental Capacity Act. This is because they have been independently assessed to lack the capacity to consent to their care and that the restrictions in place have been assessed to be in their best interests.

The following table shows a breakdown of these 10 adults in terms of the type of residential care.

Residential Category	Number of Adults
Adult Alcohol Misuse - Residential	2
Adult with MH Needs - Residential	1
Older People - Residential	5
Adult-Mental Health-Nursing Home	2

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It is worth noting that the above data is a snapshot and does not take into account admission rates which are much higher in the CoL housed residential population who tend to enter residential care at a later stage and for shorter duration. Those who have experienced homelessness or rough sleeping generally enter residential accommodation at an earlier age and remain there for a longer period. This could be viewed as suggestive of greater needs at an earlier point in their life and the positive impact of residential care on their life expectancy.

Safeguarding Concerns and Enquiries

ASC receives between 50 to 60 safeguarding concerns in total each year, with approximately 50% of those leading to safeguarding enquiry.

The Care Act criteria for a safeguarding enquiry is that an adult in the local authority area (whether or not ordinarily resident there),

(a) has needs for care and support (whether or not the authority is meeting any of those needs),

(b) is experiencing, or is at risk of, abuse or neglect, and

(c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

If this criterion is met then the local authority must make (or cause to be made) whatever enquiries it thinks necessary to enable it to decide whether any action should be taken in the adult's case and, if so, what and by whom.

The following table shows the number of safeguarding concerns raised regarding adults who were rough sleeping or homeless and how many of these progressed to a safeguarding enquiry.

Year	Concerns	Enquiries
2021/22	9	4
2022/23	11	4
2023/24	10	4
2024 Apr to Dec	9	4

The data shows that overall, 41% of concerns progressed to a safeguarding enquiry which around 8% is lower than for ASC as a whole. Reasons why concerns are not progressed to enquiries include,

- the adult does not meet one or more of the criteria, e.g. they do not have care and support needs.
- the adult cannot be located.
- The adult does not wish to proceed with an enquiry and there is no basis for overriding their wishes.

Safeguarding Enquiries by Types of abuse

Year	Types of abuse
2021/22	Self-neglect (2) Neglect and acts of omission (1) Sexual (1)
2022/23	Self-neglect (4)
2023/24	Self-neglect (4)
2024 Apr to Dec	Self-neglect (1) Neglect and acts of omission (1) Physical (1) Financial (1)

Prevention

Prevention is a key principle of adult safeguarding following the premise that it is better to prevent harm before it occurs. The joint funding of the Homelessness and Rough Sleeping Social Worker role enables the capacity and expertise to undertake work with adults at the 'edge of care' as well as those meeting the statutory criteria for support under the Car Act. HRS social worker operates with a caseload in the region of 18 adults, half of which are likely to be with the preventative cohort, although numbers may vary with demand.

In 2022 Adult Social Care realigned its service to enable a stronger emphasis on a strengths-based approach. The objective of the strengths-based approach is to protect the individual's independence, resilience, ability to make choices and wellbeing. Supporting the person's strengths can help address needs (whether they are eligible or not) for support in a way that allows the person to lead, and be in control of, an ordinary and independent day-to-day life as much as possible. It may also help delay the development of further needs.

Part of this approach was to create an innovative strengths-based practitioner role in the service to provide short term support to adults to achieve their goals, improve their wellbeing in order to prevent, reduce and delay their needs for care.

Following on from this, a similar strengths-based practitioner role has been introduced to the HRS service to work alongside the HRS social worker. This 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.

City and Hackney Safeguarding Adults Board

The Care Act requires every Local Authority to establish a Safeguarding Adults Board (SAB) for its area. The 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.

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One of the core functions of the SAB is to conduct Safeguarding Adult Reviews (SARs) in accordance with Section 44 of the Care Act 2014, identifying lessons to be learnt from serious safeguarding cases and using them to improve how partner agencies work together to safeguard adults.

The City and Hackney SAB has to date published fourteen SARs in total, which includes both those meeting the mandatory legislative threshold, and those which have been carried out under discretionary powers within the Care Act. Three of these SARs are regarding adults who had been rough sleeping, including one discretionary SAR regarding the death of a man who had been rough sleeping in the City of London. There has been engagement at all stages by HRS and ASC staff in the SAR process to ensure learning within the organisation and its partners.

In May 2024, a ministerial letter was sent to Directors of Housing and Adult Social Care, and Safeguarding Adults Board Chairs, outlining recommendations for Safeguarding Adults Boards regarding individuals rough sleeping. The City of London reviewed the recommendations and provided a response to the City and Hackney SAB providing assurance that a mature system is already in place to meet recommendations and additional measures being taken to strengthen it further. A separate report of this has previously been presented at the HRS subcommittee.

In addition to the CHSAB there is a separate City of London Adults Safeguarding Board Sub Committee, attended by both the Assistant Director for People, the Head of Adult Social Care and the Head of Homelessness and Rough Sleeping.

High Risk Panels and multi-agency approaches

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 as outlined below.

Task And Action

This is a monthly meeting to ensure a multi-agency approach to supporting the most vulnerable individuals who rough sleep is embedded in the City of London's Rough Sleeping approach.

One of its stated roles is to address the immediate safeguarding needs of individual rough sleepers and to consider whether there is a need for referrals for statutory assessments including Housing assessment, Care Act assessment, Safeguarding or Mental Health Act assessment.

Challenge Group

To receive referrals directly from providers and/or City officers, or as an escalation route from the above Task and Action group. To analyse, discuss and challenge the blockages in supporting long term entrenched rough sleepers away from the streets in accordance with the CoL's strategic priorities to tackle rough sleeping and associated street activities.

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Complex needs Panel

An ASC funding panel to discuss and authorise all high cost, high risk, or complex needs interventions. It provides oversight, guidance, challenge, and scrutiny for all ASC admissions to accommodation-based support.

Safeguarding Meeting

This meeting can be called on any individual case where a formal safeguarding process is taking place. The purpose of this meeting is to share information, identify and manage risk, plan how to safeguard the person and review actions. Its status as a statutory meeting enables the potential to call to account partners or agencies who are not be engaging with the process, and if necessary, escalate to the CHSAB.

Community MARAC

The City of London Crime and Anti-Social Behaviour Multi-Agency Panel (the Panel) provides a forum through the City Community Multi-Agency Risk Assessment Conferences (CCM) for professionals to share information to more effectively address criminal and anti-social behaviour (ASB) in the City of London. The Panel is responsible for considering individual complex and high-risk cases referred by core agencies/partners to reduce and prevent crime and disorder, and to reduce the risk of individuals to themselves and others, where the referral to the Panel is justified as being necessary and proportionate and in the overriding public interest.

Mental Health

Severe mental illness is common amongst the rough sleeping population and can present a significant barrier to engagement with services. The City of London works in partnership with the East London Foundation Trust's Rough Sleeping and Mental Health Programme (RAMHP) who provide expertise and support improving access to mental health services for people sleeping rough.

Mental Act Duties

Separate to RAMPH, the City of London commissions certain duties under the Mental Health Act 1983 from East London Foundation Trust in order to ensure that adults benefit from a robust service with in-depth expertise.

Specifically, the following duties are commissioned in this regard,

- Mental Health Act Assessments
- Mental Health Tribunal Reports
- Responsibilities under the Community Mental Health framework

Additionally, out of hours Mental Health Act Assessments are commissioned from London Borough of Hackney.

Regular contract monitoring is in place to ensure oversight of the provision of legal functions on behalf of the City.

The Mental Capacity Act

Understanding and applying the Mental Capacity Act to those who are homeless or sleeping rough can be complex and challenging. All social workers across ASC and HRS are trained in the Mental Capacity Act and have access to in depth legal literacy training. The below table shows the number of mental capacity assessments undertaken by social workers on the City HRS cohort.

Year	Mental Capacity Assessments	Number of adults assessed.
2021/22	5 (1)	4 (1)
2022/23	3 (5)	1 (3)
2023/24	4 (2)	4 (2)
2024 Apr to Dec	2 (2) 1 in progress	2

As mental capacity act assessments are decision and time specific, more than one assessment may be completed on each individual. Therefore, the table is split into 2 columns, one showing the number of assessments and the other the number of adults assessed.

The first figure indicates those who were either homeless or rough sleeping at that point, while the figure in brackets indicates the number of assessments for former homeless adults in settled accommodation who are open to ASC.

The above figures do not include Independent Mental Capacity Assessments carried out for the purposes of the Deprivation of Liberty Safeguards, mentioned in the above section on Residential Care.

Quality Assurance

Adult Social Care has a Quality Assurance Framework in place to ensure the delivery of high-quality services to adults at risk in need of support. This includes governance of the quality assurance process and an agreed annual schedule of audits/feedback.

Audit Schedule

As part of the QA framework ASC have an audit schedule in place to provide assurance, accountability, and improvement across practice. The following table is taken from the schedule to show the audit areas and frequency most relevant to Homelessness and Rough Sleeping.

Audit	Comments
Safeguarding	An annual audit of ASC statutory safeguarding practice.
Care Act Duties and Assessment	An annual audit of ASC practice regarding the implementation of Care Act duties, including the assessment of adults with care and support needs
Management Oversight Annually	An annual audit looking at the management oversight of ASC practice across
Homelessness and Rough Sleeping (specific)	A specifically themed Homelessness and Rough Sleeping audit taking place every 2 years

The last specific HRS audit was completed in 2023 and focussed on safeguarding decision-making, auditing concerns that did not reach the criteria for a safeguarding Enquiry under the Care Act 2014. The audit was undertaken by the City of London Principal Social Worker for Adults, who provided assurance to the CHSAB that *'Safeguarding Adults Managers in the City of London make good decisions and maintain appropriate records around the requirements of s.42 of The Care Act 2014.'*

In line with the 2 year-cycle an HRS specific audit will be undertaken later in 2025. Findings of the audit will be reported to Members.