

REPORT TO:	Cabinet 7 December 2022
SUBJECT:	Updating the Homelessness & Rough Sleeping Strategy
LEAD OFFICER:	Susmita Sen, Corporate Director of Housing
CABINET MEMBER:	Councillor Lynne Hale, Cabinet Member for Homes
WARDS:	All

SUMMARY OF REPORT:

This report is being presented to Cabinet because producing a Homelessness and Rough Sleeping Strategy is a statutory requirement for local authorities.

The report sets out the Council's approach to revising the existing Homelessness & Rough Sleeping Action Plan for 2023/2024, following guidance from DLUHC, and for undertaking a comprehensive review of homelessness in the Borough in developing a three-year strategy from 2024/2025.

The revised action plan strengthens the Council's approach to rough sleeping and will ensure the Council's homelessness services are focused on early intervention and prevention.

The report also provides an update to Cabinet on the key actions that are proposed to be taken by the Council and its partners to help prevent and address homelessness in 2023/2024.

The revised Action Plan builds on progress to date and seeks to entrench activities already underway in this area, while also seeking to be more ambitious in key areas to further improve outcomes during 2023/24.

FINANCIAL IMPACT:

The estimated cost to produce a revised Homelessness & Rough Sleeping Strategy is £135k across 2022/2023 and 2023/2024. This strategy will underpin the re-structure the Housing Directorate and drive savings of £1+m. A transformation funding bid has been approved.

KEY DECISION REFERENCE NO.:

The Executive Mayor in Cabinet is recommended to...

RECOMMENDATIONS:

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| <ol style="list-style-type: none">i. Approve the updated draft 2023/24 Homelessness and Rough Sleeping Strategy Action Plan (Appendix One)ii. Note and approve the Housing Directorate's plan to develop a revised Homelessness & Rough Sleeping Strategy, following a comprehensive review of homelessness in the Borough, which will set out the strategic direction for service delivery for 2024- 2027. |
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1. BACKGROUND

- 1.1 Under the Homelessness Act 2002, all housing authorities must have a homelessness strategy in place. The current draft Homelessness & Rough Sleeping Prevention Strategy 2019- 2022 was informed by a homelessness review conducted in 2018. The Strategy was presented to Cabinet in October 2019 where delegated authority was given to the Cabinet Member to recommend the updated Homelessness & Rough Sleeping Prevention Strategy to full Council for adoption once the outcome of the consultation had been considered.
- 1.2 Consultation was held in early January 2020 with broad support for the proposed pledges and outcomes from internal and external stakeholders. However, the Strategy was not presented to full Council for reasons including the Section 114, the Covid-19 pandemic and the resulting pressures from the 'Everyone In' scheme, Ukrainian/Afghan re-settlement, and the lack of a discrete Housing Directorate.
- 1.3 Following guidance from DLUHC, a revision of the Strategy action plan has been undertaken to ensure the Council has a strategic direction on how the homeless service is delivered pending the development of a revised Homelessness & Rough Sleeping Strategy to be undertaken in 2024.
- 1.4 The revised Action Plan reflects the Executive Mayor's focus on addressing rough sleeping and homelessness in the Borough, in line with Mayor's Business Plan 2022- 2026.

2. RESPONDING TO THE LEVELS OF HOMELESSNESS IN THE BOROUGH

- 2.1 The Council anticipates an increased number of homeless applicants in the Borough due to the cost-of-living crisis. The draft Action Plan will ensure that homelessness services are available to the most vulnerable residents during this crisis. Cabinet should note, however, that demand for homelessness services will continue to exceed the provision the Council is able to deliver.

2.2 A high number of households are placed in Croydon from other local authorities which results in increased homelessness pressures in the Borough. In the last three years, a total of 10,933 homeless placements were made in the Borough:

Homelessness placements made in the Borough in the last three years		
Placed by the Council	41%	4483
Placed by other local authorities	59%	6450
Wandsworth	18.6%	2029
Lambeth	11.1%	1219
Sutton	9.7%	1065
Other	19.6%	2137

2.3 As an outer London borough, Croydon is considered a more cost-effective location to place homeless households. The Council notes, however, that improved adherence to the Homelessness Reduction Act 2017 by the Housing Needs service would reduce the homelessness pressures on the Council.

2.4 Available data indicates that the Council has missed opportunities to intervene earlier in homelessness cases. Recent benchmarking data shows that in 2020-21, Croydon was in the bottom quartile for performance in preventing homelessness at 27.7% compared to the London average of 43.7%. At present the structure of the Housing Needs service does not support early intervention to prevent or relieve homelessness which will be addressed through the Housing Needs Re-Structure in Appendix One.

2.5 The Council also anticipates an increased number of rough sleepers in the Borough due to the cost-of-living crisis. The number of rough sleepers in the current period can be quantified as follows:

Borough Rough Sleeping Numbers (17/11/2022)	
Rough sleepers on any one night	20-25
Per month (November)	45-65
Q2 2022/2023	137

2.6 The number of rough sleepers in the Borough in Q2 2022/2023 was the highest of all outer London boroughs. Each month approximately 10-12 individuals refuse the Council's offer of support at any one time, and the Council is currently developing a joint-working protocol to improve engagement (Appendix One). Benchmarking data for Q2 2022/2023 on neighbouring boroughs is available below. Cabinet should note that the number of rough sleepers in Croydon is closer to that of inner London boroughs.

Total rough sleeping numbers by borough Q2 2022/2023 (CHAIN)	
Lambeth	215

Southwark	157
Croydon	137
Lewisham	90
Wandsworth	49
Bromley	29
Merton	19
Sutton	14

- 2.7 Of the 137 rough sleepers identified in Q2 2022/2023, 48% were new rough sleepers with no second night out whilst only two new rough sleepers were recorded as having joined the living on the streets population. As such, the Council is successful in preventing individuals who are new to sleeping rough from living on the streets.

3. **UPDATING THE EXISTING HOMELESSNESS & ROUGH SLEEPING STRATEGY ACTION PLAN**

- 3.1 The updated Action Plan (Appendix One) strengthens the focus on early intervention and prevention outlined in the 2019- 2022 Strategy and ensures there is a continued strategic direction for the delivery of the homelessness service pending the development of the revised Homelessness & Rough Sleeping Strategy. The revised Action Plan will ensure joint working to address the hotspots of street homelessness across the Borough and will enable the Council to deliver compassionate to those to whom owes a statutory duty in line with the Homelessness Reduction Act 2017.
- 3.2 The Action Plan aligns with the objectives of the [Government's rough sleeping strategy](#) in addressing homelessness and rough sleeping. The Action Plan focuses on the following key priorities:
- Embed the focus on preventing people from losing their homes and improve the number of prevention outcomes in service delivery
 - Focus activity on moving people out of temporary accommodation into suitable settled housing which will reduce reliance on higher cost, lower quality accommodation
 - Adopt a proactive approach towards alleviating and reducing rough sleeping in the Borough by providing an appropriate pathway into safe, secure accommodation for those rough sleeping through partnership working
 - Develop a cross-directorate joint-working protocol with internal and external partners to effectively support the minority of non-engaging rough sleepers in moving off the streets
 - Improve our strategic relationships with statutory and voluntary sector to address homelessness demand and supply including Registered Social Providers in the borough
 - Build on joint working with other partner agencies to ensure resources are focused on the most vulnerable households, for example our work with Public Health to support people with substance misuse

- 3.3 The delivery of the Action Plan will be monitored by the Housing Transformation Programme Steering Board which is chaired by the Cabinet Member for Homes and reports directly to CMT.
- 3.4 The delivery of the revised Action Plan will be resourced through existing budgets and transformation funding secured. The revised Action Plan will also ensure the strategic procurement of services by the Rough Sleeping Commissioning team in 2023/2024 which is predominantly funded by the Rough Sleeping Initiative grant.
- 3.5 There is widespread evidence that experiencing homelessness results in poor health outcomes. The Council recognises the importance of joint working between the Housing directorate and Public Health in addressing health issues, such as substance misuse, which can be prevalent amongst those experiencing homelessness. The Council has submitted a bid for funding to provide capacity and additional support to the Housing directorate in supporting individuals dealing with substance misuse issues and is awaiting the result of the award.

4. DEVELOPING A REVISED HOMELESSNESS & ROUGH SLEEPING STRATEGY

- 4.1 As required by legislation, the new Strategy will set out the plans for tackling homelessness and finding settled and sustainable housing solutions for those threatened with the prospect of losing their homes.

In doing so, the Strategy will strengthen the Council's prevention offer with an emphasis on enabling residents to maintain their independence. Building upon the revised Action Plan, the Strategy will further development move on pathways for rough sleepers to reduce street homelessness in the Borough.

- 4.2 The revised Strategy will address the pressures outlined in 2.0 through creating a sustainable Housing Needs service. A complete review of homelessness will be carried out to evaluate the current picture of homelessness in the Borough to evidence the conclusions drawn in 2.0 and forecast future pressures. The review will include:

- levels of homelessness
- preventing homelessness
- securing accommodation
- support provided and resources available

- 4.3 The draft strategy will be co-designed with residents, service-users and staff ahead of consideration by Cabinet in 2023/2024. A consultation on the objectives and actions of the draft strategy that the Council intends to publish will be carried out - involving other public and voluntary sector

stakeholders and people with experience of homelessness/housing needs.

- 4.4 Cabinet approval will be sought for the final draft strategy and action plan to be delivered over the next four years. This will dovetail with the Housing Strategy which will be presented to Cabinet in 2023.

5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 5.1 The revision of the Homelessness & Rough Sleeping Prevention Strategy action plan will not require additional financial resource and will be developed by existing Housing directorate staff.
- 5.2 The full review of the Homelessness & Rough Sleeping Prevention Strategy, to begin in early 2023, will be led by a Homelessness Strategy Lead and will take 15 months to March 2024. Funding of £135k has been requested to cover the costs of this appointment.
- 5.3 Approved by Sarah Attwood, Head of Finance (Housing)

6. LEGAL CONSIDERATIONS

- 6.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Legal Services and Monitoring Officer that under Section 1 of the Homelessness Act 2002 a local housing authority may from time to time carry out a homelessness review for their district and formulate and publish a homelessness strategy based on the results of that review. The authority must exercise that power so as to ensure that a new homelessness strategy for their district is published within 5 years of the date of publication of their last homelessness strategy.
- 6.2 Under Section 3 of the Act, a homelessness strategy means a strategy for preventing homelessness in the district, securing that sufficient accommodation is and will be available for people in their district who are or may become homeless, securing the satisfactory provision of support for people in the district who are or may become homeless, or who have been homeless and need support to prevent them becoming homeless again.
- 6.3 In formulating or modifying a homelessness strategy, the authority must have regard to its current allocation scheme, its current tenancy strategy, the current London housing strategy, and the extent to which objectives can be achieved by other public bodies, voluntary organisations etc. Before adopting or modifying a homelessness strategy, the authority must consult such public or local authorities, voluntary organisations or other persons as they consider appropriate.

- 6.4 A homelessness strategy may include specific objectives to be pursued, and specific action planned to be taken in the course of the exercise of their housing and social services functions. The authority must keep their homelessness strategy under review, and may modify it from time to time, and the modifications or the strategy as modified must also be published.
- 6.5 In carrying out a homelessness review, and in developing the revised Homelessness and Rough Sleeping Strategy, the authority must have regard to the code of practice issued by the Secretary of State under Section 214a of the Housing Act 1996- Homelessness code of guidance to local authorities.
- 6.6 Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer.

7. HUMAN RESOURCES IMPACT

- 7.1 There are no immediate human resources impacts arising from the updating of the Homelessness & Rough Sleeping Prevention Strategy action plan as this work will be undertaken by existing staff resource. However, there will be impacts associated with the development and delivery of the revised Homelessness & Rough Sleeping Prevention Strategy beginning in 2023. If any issues should arise these will be managed under the Council's policies and procedures.
- 7.2 Approved by Jennifer Sankar, Head of HR for Housing and SCRER, for and on behalf of Dean Shoemith, Chief People Officer

8. EQUALITIES IMPACT

- 8.1 The transformation of the Housing Directorate must champion inclusion through the services it provides to residents, and inclusion of our diverse resident communities will be central to the training and support offered to staff.
- 8.2 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, "have due regard to" the need to comply with the three aims of the general equality duty. These are to
- Eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Act
 - Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
 - Foster good relations between people who share a protected characteristic and people who do not share it

- 8.3 Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.
- 8.4 Regard for the Council's public sector equality duty will be central to the delivery of the updated Homelessness & Rough Sleeping Prevention Strategy action plan and revised Strategy. The development of a Strategy which reflects the needs of protected characteristic groups in the Borough will be enabled through an increased focus on collecting equalities detail as part of the Housing Transformation Programme.
- 8.5 Improving data collection from service users across the nine protected characteristics will benefit decision making by ensuring that decisions are based on clear evidence. Departments will also evidence service user satisfaction and dissatisfaction using this method across the protected characteristics to ensure that the Council is delivering a fair and equitable service to all protected groups.
- 8.6 Poor housing conditions and perceptions of unfair treatment are likely to exasperate existing mental health conditions or create new mental health conditions. In particular, when exasperated by other socio-economic impacts such as poverty, unemployment, and the cost-of-living crisis. It is important that residents are treated in a fair, respectful, and equitable manner to ensure that existing or new conditions are not triggered by behaviour of staff or suppliers. It is important that staff training reflects this.
- 8.7 Residents with disabilities or parents of children with disabilities may be treated more favourably than others in relation to housing improvements. This will not amount to discrimination in relation to the Equality Act 2010.
- 8.8 The Council will also encourage its suppliers to adopt the Council's standards for equality in the borough: Croydon's Equalities Pledge and the George Floyd Race Matters Pledge.
- 8.9 Approved by Felisha Dussard, Equalities Officer on behalf of Denise McCausland, Equalities Manager

9. ENVIRONMENTAL IMPACT

- 9.1 The updated Homelessness & Rough Sleeping Strategy action plan has no direct environmental impacts.

9.2 Approved by Susmita Sen, Corporate Director of Housing

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are no crime prevention and reduction implications as a result of the recommendations in this report.

8 DATA PROTECTION IMPLICATIONS

8.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

No, as the report does not contain sensitive or personal data

CONTACT OFFICER: *Susmita Sen, Corporate Director for Housing*

Appendix One

Homelessness & Rough Sleeping Prevention Strategy: updated action plan Key Milestones to be Achieved 2023				
Theme	Transformation Action	Associated Outcome/Aim	Lead	End date
Early intervention and prevention	Data Cleanse	Improve the accuracy of data for government returns to ensure the Council's full receipt of the Homelessness Prevention Grant	Head of Homelessness	March 2023
Early intervention and prevention	Housing Needs Re-Structure	Complete and implement a new structure for the Housing Needs service to ensure we work effectively with our partners to prevent homelessness and manage demand	Heads of Service	September 2023
Make effective use of temporary	Discretionary Case Review	Complete the review of discretionary cases in temporary	Head of Temporary Accommodation	March 2024

accommodation		accommodation to reduce the cost to the general fund by moving them into alternative settled accommodation		
Make effective use of temporary accommodation	Data Cleanse	Improve the accuracy of data on households in temporary accommodation to ensure the number of families in temporary accommodation for an extended period of time are monitored	Head of Temporary Accommodation	March 2023
Make effective use of temporary accommodation	Occupancy Checks	Carry out occupancy checks to ensure the accommodation is occupied by homeless households placed by the Council to meet housing duty.	Head of Temporary Accommodation	March 2024
Maximise the supply of affordable accommodation	Housing Association partnership	Develop and build relationships with registered social landlords in the borough to ensure we are getting our full allocation of nominations to maximise the number of homes available to residents	Head of Allocations	March 2024
Maximise income streams	Income collection	Ensure that we collect all income due in emergency and temporary accommodation	Head of Temporary Accommodation	March 2024
Improve standards and management of temporary accommodation	Dynamic Purchase System	Ensure best value for money through effective contract Improve and property compliance of the emergency accommodation portfolio	Head of Temporary Accommodation	March 2024

Improve standards and management of our accommodation	Supported Housing Review	To undertake a review of supported housing to identify need, commission the right accommodation and ensure value for money	Corporate Director for Housing	September 2024
Provide support to those most in need	Occupancy Checks	Undertake visits to households in temporary accommodation to carry out welfare checks and refer/signpost to relevant support agencies	Head of Temporary Accommodation	March 2024
Tackling rough sleeping	Rough sleeping	Commission a rough sleeping outreach service to support rough sleepers off the streets.	Head of Temporary Accommodation	March 2024
Tackling rough sleeping	Rough sleeping	Deliver an effective No First Night Out approach	Head of Temporary Accommodation	March 2024
Tackling rough sleeping	Rough sleeping	Create 'Housing First' opportunities to end entrenched rough sleeping	Head of Temporary Accommodation	March 2024
Tackling rough sleeping	Rough sleeping	Establish a multi-agency approach and protocol, including working with the Police, Council ASB teams, and local businesses, to support non-engaging rough sleepers and reduce ASB	Head of Temporary Accommodation	March 2024