

NOTICE OF MEETING

Cabinet Member Signing: Taken Under Special Urgency

Monday, 27th July, 2020, 10.00 am - urgent

Members: Councillor Emine Ibrahim – Cabinet Member for Housing and Estate Renewal

Quorum: 1

1. APOLOGIES FOR ABSENCE

2. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

3. ROUGH SLEEPING DISCRETION POLICY (PAGES 1 - 32)

Ayshe Simsek
Democratic Services and Scrutiny Manager

Tel – 0208 489 2929
Fax – 020 8881 5218
Email: ayshe.simsek@haringey.gov.uk

Bernie Ryan
Assistant Director – Corporate Governance and Monitoring Officer
River Park House, 225 High Road, Wood Green, N22 8HQ

Friday, 24 July 2020

Report for: Cabinet Member Signing - Special Urgency

Title: Policy on providing accommodation to people who are rough sleeping or at risk of rough sleeping during the Covid-19 pandemic

Report

Authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Robbie Erbmann, Assistant Director Housing
Charlotte Pomery, Assistant Director Commissioning

Ward(s) affected: All

Report for Key/

Non Key Decision: Key Decision

1. Describe the issue under consideration

- 1.1. Haringey Council (the Council) is the Local Housing Authority, and, under the Housing Act 1996, has a duty to provide accommodation to certain homeless people who are eligible for that assistance and have a priority need.
- 1.2. In the context of the Covid-19 pandemic and the lockdown imposed in England, Luke Hall MP, Under Secretary of State at the Ministry for Housing, Communities and Local Government (MHCLG), wrote to local authorities on 26 March 2020 requesting them to provide accommodation to anyone rough sleeping, or at risk of rough sleeping. This became known as the 'Everybody In' approach. The Council therefore used its discretion to provide accommodation to people to whom it did not owe this duty under the Housing Act 1996. In doing so, the Council is likely to have saved lives and improved outcomes for some of the borough's most vulnerable residents.
- 1.3. Since then, in a letter from Luke Hall MP to local authority Chief Executives in England, dated 28 May 2020, MHCLG has requested that local authorities develop exit strategies for those who have been placed in emergency accommodation, and develop locally appropriate strategies to determine who will continue to be provided with accommodation. Further to this, on 29 June 2020, MHCLG issued an update to the statutory Homelessness Code of Guidance for local authorities, instructing them to take into account people who have vulnerabilities making them particularly at risk of serious illness from Covid-19.
- 1.4. Given this change in guidance – from the 'Everybody In' approach, to developing policies which take into account the impact of Covid-19 on vulnerable people, and other local contexts - the Council is re-examining its use of discretion, and is proposing adopting a discretion policy for people who are rough sleeping, in order to continue providing accommodation to the borough's most vulnerable residents.

2. Recommendations

- 2.1. It is recommended that the Cabinet Member

2.1.1. Adopts the Rough Sleeping Discretion Policy attached at Appendix 1.

2.1.2. Delegates authority to the Director of Housing, Regeneration and Planning, in consultation with the Cabinet Member for Housing and Estate Renewal, to amend this policy to give effect to changes in legislation or statutory guidance, or directives or requests of a similar character issued by Government.

2.1.3. Agrees that this policy will terminate on 30 September 2020 unless terminated earlier or extended beyond this date by Cabinet / Cabinet Member decision.

3. Reasons for decision

3.1. From 26 March 2020, in the context of the spread of Covid-19, the risks of contracting it and the government imposed lockdown, the Council has provided accommodation to a number of people whom it does not owe a duty to accommodate, exercising discretionary powers. As external factors and conditions change, and as directed by MHCLG, the Council is amending its approach to accommodating people who are rough sleeping to ensure that the most vulnerable continue to be accommodated.

4. Alternative options considered

4.1. The first alternative option is to continue with the approach that has been taken since 26 March 2020, i.e. to offer accommodation to anyone in the borough rough sleeping, or at risk of rough sleeping. The reason this option is not recommended is that local authorities have been directed by MHCLG to adopt locally appropriate policies, and the cost of continuing to provide emergency accommodation and welfare support to everyone rough sleeping, or at risk of rough sleeping is projected to cost over £6.8m for a single year, an unplanned and unsustainable cost to the General Fund without additional dedicated funding. Although new funding has been announced by MHCLG it has not been sufficiently detailed to allow the Council to continue with the current approach and given the overall size of the funding pot is £105m to meet the national cost, Haringey's allocation is likely to be insufficient to cover the full cost.

4.2. The second alternative option is to return to the approach taken prior to 26 March 2020, i.e. to offer accommodation only to those to whom the Council owes a homelessness duty. The reason this option is not recommended is that this would mean that a number of at-risk people would not be provided with accommodation, and it is likely that they would be disproportionately negatively affected by sleeping rough in the context of the Covid-19 pandemic; additionally it is not in line with the changes to the Homelessness Code of Guidance.

5. Background

The 'Everybody In' approach

5.1. On 26 March 2020, in response to the increased risks faced by vulnerable people during the pandemic, Luke Hall MP (Minister for Local Government and Homelessness at the Ministry of Housing, Communities and Local Government) wrote to all local authorities requesting them to accommodate anyone who was, or was at risk of, rough sleeping. The letter also advised local authorities to focus on others living in accommodation where it would be difficult to self-isolate, such as

dormitory style night shelters and assessment centres. This request from MHCLG has become known as 'Everybody In' and advised that local authorities needed to use alternative powers and funding to assist those who would not normally be eligible for homelessness assistance.

- 5.2. In Haringey, the Council worked with Homes for Haringey and partners across the borough in order to ensure that anyone who was, or was at risk of, sleeping rough was accommodated. As a result, over 500 people were placed in emergency accommodation. This change in approach was noted in a report signed by the Leader on 6 April 2020, outlining financial interventions made by the Council to help the borough and residents with the impact of Covid-19. On 30 April 2020 a report was signed by the Leader including an update on efforts to provide accommodation to everyone in the borough sleeping rough, or at risk of doing so.
- 5.3. The application of 'Everybody In' in Haringey has, at the least, improved outcomes for, and at the most, saved the lives of, a number of Haringey's most vulnerable residents. Indeed, Covid-19 and Luke Hall's directive has enabled the Council to engage with a number of people who are both vulnerable and hard to reach, and ensure that these people have been receiving support from a range of services – as well as accommodation, the Council has been providing those it has placed in emergency accommodation with food and hot meals, and facilitating engagement with health services. The Council has also committed to working with these residents to ensure that they are supported to continue living in settled accommodation once they move on from their emergency accommodation.
- 5.4. The Council has provided accommodation for over 500 individuals since March 2020. Only 33 of these would have been provided with accommodation by the Council had they approached the Council prior to March 2020. Around 50% of those accommodated have drug or alcohol needs; 30% are under 35 years old, 5% under 25 years old. Around 60% of these were not street homeless when they approached the Council. The average cost of an emergency accommodation placement, inclusive of all welfare and subsistence is £65 per person per night.
- 5.5. Haringey's Borough Plan 2019-2023 also commits the Council to ending rough sleeping by 2023: the interventions that have taken place since March 2020 have been significant in helping this target be met. In May 2020, the lowest ever number of people (9) were recorded as sleeping rough.

Recent changes in guidance and direction

- 5.6. While MHCLG has not requested that local authorities stop providing accommodation to anyone who needs it, it has requested that local authorities develop locally appropriate policies and strategies to both move people on from emergency accommodation and to determine who should be provided with accommodation going forward, moving away from the previous blanket approach. The Council has developed an Exit Strategy, to move people on from emergency accommodation to more settled accommodation. There are a number of strands to the Exit Strategy, in order to meet the needs of different groups of people, but broadly its aim is to ensure that those housed by the Council in emergency accommodation from March receive support from the Council to find appropriate settled accommodation.

- 5.7. Further to this, on 29 June 2020, MHCLG issued an update to the statutory Homelessness Code of Guidance for local authorities. Paragraph 8.44 specifies that ‘Housing authorities should carefully consider the vulnerability of applicants from COVID-19’. Paragraph 8.45 specifies that ‘Housing authorities should also carefully consider whether people with a history of rough sleeping should be considered vulnerable in the context of COVID-19, taking into account their age and underlying health conditions’. This represents a move away from the emphasis upon emergency provision and the incorporation of Covid 19 risks as an element of a “new normal”.

The Council’s proposed new approach

- 5.8. In these circumstances, the Council will need to amend the approach it has taken to determine who will be housed. The Rough Sleeping Discretion Policy has been developed to guide to approach the Council will take. Further changes in guidance or legislation, or further requests from Government for a change of approach, may well occur in the short to medium term; in these circumstances the Rough Sleeping Discretion Policy will be amended to reflect these.
- 5.9. The Rough Sleeping Discretion Policy identifies the key circumstances in which discretion may be applied. This policy concerns people who are not covered by the Council’s existing duty. The Rough Sleeping Discretion Policy provides for accommodation to be provided to certain CHAIN verified people. CHAIN – Combined Homelessness and Information Network – is a multi-agency database recording people sleeping rough in London, commissioned by the Mayor of London and delivered by St Mungo’s, and helps to ensure that people sleeping rough are receiving the most appropriate support from local authorities and other agencies. The circumstances in which discretion may be applied are as follows:
- 5.9.1. Where someone is CHAIN verified, is eligible for assistance but would not ordinarily be considered to have a priority need, the Council will consider whether they are currently at additional risk if they were to contract Covid-19. This would include people who have been told to shield, people with health conditions leading to a greater risk of serious illness from Covid-19 infection, and people who have characteristics that have been linked to a higher risk of serious illness from Covid-19 infection, including race.
- 5.9.2. Where someone is CHAIN verified but is ineligible for housing assistance due to, for example, their immigration status (including those formally designated as having no recourse to public funds (“NRPF”)), the Council will consider whether they would have had a priority need or have been considered at increased risk, as described above and will carry out individual statutory assessments to identify what powers are available (see 8.11). The Council will then, subject to that assessment, offer a placement supported through a funding settlement from MHCLG for implementing the ‘Suspension of Derogation’ which removes restrictions affecting EU-Nationals entitlement to support if affected by rough sleeping.
- 5.9.3. Where someone is identified as part of the MEAM30 cohort; a group of thirty vulnerable adults experiencing multiple disadvantage homelessness, who are supported by the Haringey “Making Every Adult Matter” partnership.

5.9.4. Only people with a local connection to the borough will be accommodated, with the exception of CHAIN verified people who have been found bedded down in the borough on two or more occasions within the last 12 months. Those without a local connection to Haringey will be referred on to the relevant local authority as soon as possible.

Cost

- 5.10. The change of approach means that the Council is likely be offering accommodation to more people than it was prior to March 2020, but fewer than have been accommodated since March 2020. This will therefore represent a reduction in cost from the current position, but an additional cost from the pre-March position.
- 5.11. It is difficult to accurately estimate the increased cost because the number of people presenting will fluctuate. However, a current estimate is an increased cost from the pre-March position of £298,350 over 3 months.
- 5.12. Similarly, it is difficult to accurately estimate the reduction from the existing “Everybody in” position. However, a current estimate of adopting the proposed policy is a reduction in cost of £2,211,300 over 3 months.

6. Contribution to strategic outcomes

- 6.1. This policy helps meet the priorities and outcomes of Haringey’s Borough Plan 2019-2023, in particular the outcome to ‘work together to prevent people from becoming homeless, and to reduce existing homelessness’ and specifically the objective to ‘aim to end street homelessness by 2022’.

7. Statutory Officer Comments

Finance

- 7.1. This report is proposing to adopt a temporary discretionary policy for housing a smaller cohort from the existing “everybody in” policy adopted to house people who are rough sleeping due to Covid-19. This represents a reduction, from the time the policy is adopted, of accommodating 150 people per month to an estimated 24 people per month.
- 7.2. This report does not address the existing costs of accommodating individuals currently in hotels and hostels under the “everybody in” policy.
- 7.3. If this policy is adopted, it is estimated that the total cost of accommodation for the recommended duration period of the policy will be £421,200.
- 7.4. The table below sets out the comparative accommodation costs pre-March, the cost of the recommended policy duration, and the cost of the current “everybody in” policy.

	Policy end in 3 Months with Move-on after 3 months
Pre-march position re priority need – 7 new people accommodated per month	£122,850
New proposed position re priority need – 24 new people accommodated per month	£421,200
Continuing with ‘everybody in’ – 150 new people per month	£2,632,500

- 7.5. The Leader’s report on 30th April and the 16th June Cabinet report allocated £2.0m and £2.0m respectively totalling £4.0m allocated to temporary accommodation for people who are rough sleeping.
- 7.6. This report is not seeking to increase the existing allocations for rough sleeping. It is expected that the total allocation will cover move on and associated staffing costs not factored into the above table.
- 7.7. At the end of July 2020, a total of £2.3m would have been spent on providing temporary accommodation for rough sleeping during this COVID period.

Legal

- 7.8. The Assistant Director of Corporate Governance has been consulted in the drafting of this report.
- 7.9. The Council’s duty to accommodate the eligible homeless at the point of presentation as such is limited to those whom the Council has reason to believe are homeless and have priority need, and whom the Council is not satisfied are intentionally homeless (s188 Housing Act 1996).
- 7.10. The Council does however have a “relief” duty (ss189A and 189B HA96) to assess those who have become homeless (irrespective of priority status or intentionality) and assist them in obtaining accommodation according to an agreed personal homelessness plan. The Council is not required to provide accommodation in discharge of that duty; but it does have a power to do so (s205(3) HA96). It is this power that the Council has been exercising, and proposes to continue to exercise in accommodating those who are eligible but to whom it owes no duty to provide accommodation.
- 7.11. The Council has no duty to accommodate those who by reason of their immigration status are not eligible for assistance (s185 HA96).
- 7.12. The Council does however have power to accommodate non-eligible households with children in need under s17 Children Act 1989 and also households that do not meet the requirements for care and support under the Care Act 2014 but where the provision of accommodation is necessary to avoid breach of their human rights (s1 Localism Act 2011). The exercise of these powers is subject to the outcomes of individual assessment to be undertaken by the relevant services.
- 7.13. The Council is entitled to review its use of its powers from time to time. In so doing it must take account of the impact of any changes upon those in favour of whom it is

exercising its powers, but it is also entitled – required - to ensure that its limited available resources are used to best effect in a changing situation.

- 7.14. This Council would normally undertake consultation before adoption of new policy. This policy however reflects a change to a policy which was favourable to those affected and was itself adopted without consultation. The policy after the proposed amendment still treats all those affected more favourably than before the original policy was adopted. Consultation would in any event be impractical on the timescales involved. In these circumstances, there is no legitimate expectation that the Council will consult on this amendment.
- 7.15. Under the Council's Constitution policy and key decisions must be made by Members (either the Leader, Cabinet or a Cabinet member upon delegation by the Leader). It is open to Members to delegate authority to make the changes specified at Recommendation 3.1.2. Amendments requiring policy decision will be made by members in the normal way.

Procurement

- 7.16. Strategic Procurement notes the report and confirms there are no procurement implications from the proposed change in policy.

Equalities

- 7.17. The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
 - Advance equality of opportunity between people who share those protected characteristics and people who do not
 - Foster good relations between people who share those characteristics and people who do not.
- 7.18. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 7.19. The proposed decision is to adopt the Rough Sleeping Discretion Policy. Those affected by the decision are people in Haringey who are street homeless or are at risk of becoming street homeless. Among this group, men are significantly over-represented. BAME people, people from countries other than the UK, older people, and people with long-term health conditions are also significantly represented among people who are street homeless in Haringey. The profile of known people who sleep rough in Haringey is detailed in the Equalities Impact Assessment attached to this report.
- 7.20. The objective of the proposed decision is to enable ongoing support for people who the Council does not have a duty to accommodate, but who are at higher risk of COVID-19. We know from national data that BAME people, and Black people in particular, are more at risk, as well as men, people with disabilities, older people, and

people from minority religious groups including islam, judaism, sikhism, and hinduism. The data on risk to COVID-19 is set out in the Equalities Impact Assessment attached to this report.

- 7.21. Implementation of the policy can reasonably be expected to reduce the risk of COVID-19 faced by people who are vulnerable to it. In this way, the Council is acting to prevent health inequalities among people who share protected characteristics. As such, the proposed decision represents a measure to advance equality of opportunity and prevent indirect discrimination on the basis of protected characteristics.

8. Use of appendices

Appendix 1: Rough Sleeping Discretion Policy

Appendix 2: Equalities Impact Assessment

Appendix 3: Exit Strategy

9. Local Government (Access to Information) Act 1985

Haringey Council

Policy on providing accommodation to people who are rough sleeping or at risk of rough sleeping during the Covid-19 pandemic

Introduction

1. This document sets out Haringey Council's ('the Council's') approach to providing accommodation for people who are either rough sleeping or at risk of rough sleeping during the Covid-19 pandemic.
2. The Council has a duty to provide accommodation to certain people under the Housing Act 1996. By letter of 26 March 2020, the Minister for Local Government and Homelessness (Luke Hall MP) called on local authorities to assist in ensuring that all those sleeping rough or at risk of doing so, were accommodated. In response, the Council has used its discretion to act beyond its usual duties and accommodate anyone who has been either rough sleeping or at immediate risk of rough sleeping, regardless of whether they would ordinarily be eligible, have a priority need or a local connection. In doing so, the Council is likely to have saved lives and improved the outcomes for some of the borough's most vulnerable residents.
3. As a result, the Council has placed over 500 people into emergency accommodation and is currently accommodating 378 single people (as of 24 June). The emergency accommodation has in large part been in hotels.
4. However, continuing to place people into hotels is not a sustainable position for the Council –the projected costs are a significant threat to the Council's financial position and the provision of appropriate support is unsustainable without a long term funding commitment to increase workforce capacity.
5. Additionally, the lockdown restrictions in London have been partially lifted, meaning that alternative homelessness prevention support can be offered and many people affected by homelessness during this period can return to work, and to housing arrangements with friends and family..
6. On 29 June 2020, MHCLG issued an update to the statutory Homelessness Code of Guidance for local authorities. Paragraph 8.44 specifies that 'Housing authorities should carefully consider the vulnerability of applicants from COVID-19'. Paragraph 8.45 specifies that 'Housing authorities should also carefully consider whether people with a history of rough sleeping should be considered vulnerable in the context of COVID-19, taking into account their age and underlying health conditions'.
7. This policy document sets out the Council's policy in response to this changed context; broadly, it will continue to exercise its discretion to accommodate people who are rough sleeping, but will concentrate its limited resources on those who are the most vulnerable in the context of Covid-19.

Statutory context for placements into temporary accommodation and the use of discretion

8. The Council continues to provide accommodation where under a statutory duty to do so; most commonly where the Council has a duty to do so under various provisions in Part VII of the Housing Act 1996.
9. Where an applicant does not have recourse to public funds by virtue of their immigration status or is not able to satisfy the Council that they are an EEA national exercising their treaty rights, they would not normally be eligible for statutory homelessness assistance and would be reliant on local night shelter provision if available.
10. Where a household can satisfy the requirement to be eligible, they may not automatically have a right to be provided with accommodation if they become homeless. The duty to accommodate is owed only to households who are (or whom the Council has reason to believe may be) in a 'priority need' category. Households who do not meet the threshold for priority need (e.g. those without dependent children, disability etc), are still entitled to receive advice and assistance under the legislation, but there is no duty to provide interim accommodation.
11. Since the Minister's letter the Council has used the following powers to deliver discretion:
 - Ineligible households – households who are not eligible for assistance have been placed into emergency hotel accommodation under the Council's general power of competence pursuant to the Localism Act (pursuant to Government guidance). 75 of the people we have placed are currently ineligible.
 - Eligible households – households who are eligible for assistance but would not meet the threshold of priority need, have been placed into emergency hotel accommodation using powers in the Housing Act (s205(3) Housing Act 1996 Part VII) to discharge our relief duty.

Change in the Council's approach to applying discretion

12. Due to the specific risks of Covid-19 the Council intends to continue to go beyond its basic statutory duties and exercise its discretion to house using the following criteria:
 - Where someone is CHAIN verified (ie verified by the Combined Homelessness and Information Network – a multi-agency database recording people sleeping rough in London), is eligible for assistance but would not ordinarily be considered to have a priority need, the Council will consider whether they are currently at additional risk if they were to contract Covid-19. This would include people who have been told to shield, people with health conditions leading to a greater risk of serious illness from Covid-19 infection, and people who have characteristics that have been linked to a higher risk of serious illness from Covid-19 infection, including race.
 - Where someone is CHAIN verified but is ineligible for housing assistance (including those formally designated as having no recourse to public funds – "NRPF") the Council will consider whether they have a priority need or are at increased risk, as described above. They will also carry out individual statutory assessment. The Council will then, subject to that assessment, offer a placement supported through derogation funding awarded for the period April – December 2020.

- Where someone is identified as part of the MEAM30 cohort (a group of thirty vulnerable adults experiencing multiple disadvantage homelessness, who are supported by the Haringey “Making Every Adult Matter” partnership).
13. Where the Council places into accommodation under this policy, the applicant will receive a letter confirming that the placement is made using discretionary power and does not constitute the Council having accepted a homelessness duty to accommodate under the legislation.
 14. People who do not have a local connection to the Borough will not be accommodated, with the exception of CHAIN-verified people who have been found bedded down in the borough on two or more occasions within the last 12 months. Those without a local connection to Haringey will be referred on to the relevant local authority as soon as possible.

Placements

15. Given the complexity of the investigation that can be required to assess eligibility, priority need and particularly local connection, people who approach outside office hours and contact the out of hours provider may be placed for one night or over the weekend to allow an assessment under this policy by an experienced officer.
16. When the Council decides to accommodate under this policy, the placement will be into a hotel or specified supported accommodation developed to meet this current housing need.
17. Housing-related support is currently provided on-site to 230 people, at 7 hotel locations and the Council will look to place people who have support needs into these hotels where possible.
18. The provision of welfare and subsistence support is available to a small cohort of people placed into hotels who do not have access to income through other means. This is most likely to be for those people with insecure immigration status who do not currently have access to welfare benefits or employment. This support is again offered at the Council’s discretion and will be discussed with relevant individuals once they have been offered a placement.
19. Although the Council endeavours to provide accommodation as close to Haringey as possible the unprecedented demand has meant that this is not always possible.
20. If someone is evicted from a placement due to their behaviour, or abandons their placement, the Council will not usually make a further placement. However, the Council may exceptionally decide to do so after considering their vulnerability and the suitability of available alternatives to meet their needs.
21. The Council will allow people to re-present as homeless; that is to say if someone has been previously accommodated and has left their placement but find themselves in need of accommodation assistance from the Council again, they will be entitled to be considered for accommodation under this policy. There is no limit on re-presenting.

Moving on from a discretionary placement

22. Haringey is adopting the SWEP (“Severe Weather Emergency Protocol”) ‘In For Good’ principle, i.e. making a commitment to prevent a return to street homelessness for all who have been placed.

23. The Council is, therefore, working with each person to develop and implement a move on plan. This plan will vary depending on the needs and the options available for each person. To achieve this the Council is adopting a 'single service offer' approach and will therefore expect that people will move on from temporary placements on receipt of a reasonable offer. Refusal of a reasonable offer would constitute grounds for the Council to end the temporary placement.

Policy implementation and review

24. This Policy will be applied from [x July 2020].

25. The Policy and its impacts will be reviewed on a monthly basis or sooner if deemed necessary. The review will consider data collected on people rough sleeping and on people to whom this discretion policy applies, the Council's financial position, any new government guidelines, and new restrictions on people's lives (e.g. a new lockdown in London), any government funding announcements and any better and more detailed understanding of Covid-19. The Policy will terminate on 30 September 2020, unless terminated earlier or extended beyond this date by Cabinet / Cabinet Member Signing; at this point the Policy will be reviewed to consider its costs and the Council's financial position.

EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Rough Sleeping Discretion Policy
Service area	Adults and Health
Officer completing assessment	Martin Gulliver / Hannah Adler
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	n/a
Director/Assistant Director	David Joyce

2. Summary of the proposal

The proposal is for a Rough Sleeping Discretion policy to provide accommodation to some of the borough's most vulnerable people. This is in the context of the COVID-19 pandemic and, in March 2020, the Ministry for Housing, Communities and Local Government's (MHCLG) request for local authorities to provide accommodation to anyone rough sleeping, or at risk of rough sleeping. MHCLG has now requested that local authorities develop locally appropriate strategies to both move people on from emergency accommodation and to determine who should be provided with accommodation going forward. The Homelessness Code of Guidance was also updated on 29 June 2020, and Local Authorities instructed to take into account people who have vulnerabilities making them particularly at risk of serious illness from COVID-19.

The Rough Sleeping Discretion Policy would allow the Council to offer accommodation to people who are sleeping rough but would not ordinarily be considered in priority need if they have characteristics placing them at greater risk of serious illness were they to contract COVID-19; it would also allow the Council to offer accommodation to people who have no recourse to public funds if they would have been considered to be in priority need if they did have recourse to public funds.

The key people affected by this policy are single homeless adults. This cohort of people is broadly made up of men aged between 25 and 50 years old, with over-representation of people with long-term mental health conditions, substance use needs and physical health concerns related to prolonged periods of rough sleeping, drug misuse and self-neglect. Women represent around 15% of the cohort but are often disproportionately affected by issues of previous trauma and violence, as well as substance misuse and lack of engagement with services.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Protected group	Service users
Sex	Internal Haringey JSNA 2012
Gender Reassignment	[http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna]
Age	Supported Housing Review Needs and Gaps Analysis (2017) https://www.minutes.haringey.gov.uk/documents/s91742/Appendix%202%20-%20Needs%20and%20Gaps%20Analysis.pdf
Disability	
Race & Ethnicity	Making Every Adult Matter Report (2018) https://www.minutes.haringey.gov.uk/documents/s102771/2.1%20MEAM%20Report.pdf
Sexual Orientation	

Religion or Belief (or No Belief)	<p><i>ONS reports on COVID</i> https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases</p>
Pregnancy & Maternity	
Marriage and Civil Partnership	

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough’s demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

The proposed policy sets out grounds for assistance to be provided to people whose street homelessness is CHAIN verified, who are at risk of serious illness if they contract the COVID-19 virus. The following data analysis therefore considers CHAIN verified people and groups of people who are more at risk from COVID-19.

Sex

ONS report that the age-standardised mortality rate (ASMR) for males in England was 250.2 deaths per 100,000 males compared with 178.5 per 100,000 females. In Haringey, men make up two-thirds of Covid-19 deaths.

From the last CHAIN data available (Q3: October to December 2019), there were 96 people rough sleeping in Haringey in the quarter of which 90% were male and 10% were female.

Gender Reassignment

There is no data to suggest that trans people are more or less at risk of COVID-19 than others.

The Council’s data suggests that none of the people affected by rough sleeping in the borough are trans and <1% of people placed in emergency accommodation told us they were trans. We recognise that the absence of data reflects the fear of stigma and prejudicial treatment, and issues with the CHAIN verification process, rather than the reality of homelessness for transgender people.

Age

Older people are more at risk of COVID-19. Risk increases with age, to the extent that those aged 80-89 years account for 30% of COVID-19 deaths in Haringey.

From the last CHAIN data available (Q3: October to December 2019), there were 96 people rough sleeping in Haringey in the quarter of which 9% were over-55.

Disability

People with disabilities are over three times more likely to die from COVID-19 than people without disabilities. Pre-existing medical conditions also increase vulnerability, especially those that affect the respiratory or circulatory systems such as COPD and diabetes.

Race & Ethnicity

BAME people are more at risk of COVID-19 than white British people. This is due to pre-existing health inequalities, such as higher prevalence of serious health conditions, as well as higher exposure to the virus in the course of daily life during the pandemic, whether through housing or employment. Public Health England reports that the COVID-19 death rate for people with black ethnicity is 255.7 deaths per 100,000 population for males and 119.8 for females compared 87 for white males and 5.2 for white females.

The death rate from COVID-19 has been higher for people born outside of the UK and Ireland. The biggest relative increase was for people born in Central and Western Africa (which includes Nigeria, Ghana and Somalia), the Caribbean, South East Asia (which includes Malaysia, the Philippines and Vietnam), the Middle East and South and Eastern Africa (which includes South Africa, Zimbabwe and Kenya).

From the last CHAIN data available (Q3: October to December 2019), there were 96 people rough sleeping in Haringey in the quarter of which 29% were BAME. The rough sleeping population also has a large proportion of European migrants, whose first language is not English, some of whom have no recourse to public funds but face a range of health and wellbeing issues. The policy offers these people support if they are considered to be at increased risk.

Sexual Orientation

There is no data to suggest that LGBTQ+ people are more or less at risk of COVID-19 than others.

The Council does not hold data on the sexual orientation of people rough sleeping, and <5% of people who we have placed in emergency accommodation told us they were LGBTQ+. We recognise that the absence of data reflects the fear of stigma and prejudicial treatment, and issues with the CHAIN verification process, rather than the reality of homelessness for LGBTQ+ people.

Religion or Belief (or No Belief)

The highest age-standardised mortality rates of deaths involving COVID-19 across the UK have been in the Muslim religious group with 198.9 deaths per 100,000 males and 98.2 deaths per 100,000 females. People who identified as Jewish, Hindu or Sikh also showed higher mortality rates than other groups.

The Council does not hold data on the religion of people affected by rough sleeping.

Pregnancy & Maternity

Pregnant women have been designated as a group that is more vulnerable to COVID-19 and advised to reduce social contact on this basis.

From the last CHAIN data available (Q3: October to December 2019), there were 96 people rough sleeping in Haringey in the quarter of which 10% were female. Those who are pregnant or with new-born babies would be in priority need under the Housing Act and so would already be receiving support from the local authority. They will therefore not be affected by this policy.

Marriage and Civil Partnership

There is no data to suggest that people in marriages and people in civil partnerships have been affected differently by COVID-19.

The Council does not hold data on the representation of people in marriages and people in civil partnerships among people rough sleeping.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

This policy will not be subject to a consultation since it is required to be in place urgently, in response to changed government guidance.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

n/a

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. Sex

Positive	x	Negative		Neutral impact		Unknown Impact	
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This policy will support people affected by rough sleeping who are most at risk of COVID-19. Males are over-represented in both these sub-groups and it is therefore likely to benefit these groups more.

2. Gender reassignment

Positive		Negative		Neutral impact	x	Unknown Impact	x
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There is no data on gender reassignment about people affected by rough sleeping or among those particularly vulnerable to COVID-19 but there is no reason to believe that this policy would not equally benefit those with this protected characteristic.

3. Age

Positive	x	Negative		Neutral impact		Unknown Impact	
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While the elderly are underrepresented among people affected by rough sleeping, the effect of COVID-19 is strongly related to age. This policy would provide support and shelter for this group since they would be at greater risk of serious illness resulting from COVID-19.

4. Disability

Positive	x	Negative		Neutral impact		Unknown Impact	
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Disabled people are disproportionately affected by rough sleeping and so this policy would provide much needed support. Many people with disabilities will also be at a higher risk of COVID-19 and so would especially benefit from this proposal.

5. Race and ethnicity

Positive	x	Negative		Neutral impact		Unknown Impact	
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While people from BAME backgrounds are slightly under-represented among people sleeping rough, the likelihood of COVID-19 leading to serious health problems are higher among those with a non-white ethnicity. The policy is to offer accommodation to people who have characteristics making them particularly at risk of serious illness from COVID-19, and includes race as one of those characteristics; therefore a positive impact would stem from this policy.

6. Sexual orientation

Positive		Negative		Neutral impact	x	Unknown Impact	x
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There is no data about the sexuality among of people affected by rough sleeping but there is no reason to believe that this policy would not equally benefit those with this protected characteristic.

7. Religion or belief (or no belief)

Positive		Negative		Neutral impact	x	Unknown Impact	x
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There is no data about the religion of people affected by rough sleeping but there is no reason to believe that this policy would not equally benefit those with this protected characteristic, and all religious groups will be treated equally.

8. Pregnancy and maternity

Positive		Negative		Neutral impact	x	Unknown Impact	
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Those who are pregnant or with new-born babies would be in priority need under the Housing Act and so would already be receiving support from the local authority. They will therefore not be affected by this policy

9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Positive		Negative		Neutral impact	x	Unknown Impact	x
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There is no data on marriage about people affected by rough sleeping but there is no reason to believe that this policy would not equally benefit those in marriages and those in civil partnerships.

10. Groups that cross two or more equality strands e.g. young black women

Black men are particularly impacted by COVID-19, and it is expected that this policy would have a positive effect on black men who are rough sleeping.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?**

- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?
This includes:
 - a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
 - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
 - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The overall impact of the policy is not likely to result in any direct or indirect discrimination for any group that shares any protected characteristics; this is because the policy is designed to redress inequalities in health outcomes faced by those who have characteristics making them particularly vulnerable to Covid-19.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	N
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale

<p>Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.</p>			
<p>6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:</p>			

7. Authorisation	
EqIA approved by Robbie Erbmann (Assistant Director/ Director)	Date 22 July 2020

8. Publication <i>Please ensure the completed EqIA is published in accordance with the Council's policy.</i>

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

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LB Haringey Council

Exit strategy for rough sleepers and homeless households currently housed in emergency accommodation in response to Covid-19

1. BACKGROUND

- 1.1 In March 2020, in response to the growing spread of Covid-19 the Government committed to ensuring that nobody would be sleeping rough in England and Wales. This meant that local authorities needed to urgently find emergency accommodation for people sleeping rough in their local areas. In some parts of the country, in particular in London, this has been a huge task.
- 1.2 The Housing Act (1996/2002) and Homelessness Reduction Act (2018) provide the statutory framework setting out local housing authorities' (LHA) duty to assist homeless households. In addition to confirming that someone is homeless, LHAs would ordinarily assess eligibility for assistance (e.g. relating to immigration status), 'priority need', local connection and intentionality.
- 1.3 However, since March 2020, Haringey like other LHAs, is using its general powers of competence pursuant to the Localism Act (2011) to accommodate people who would otherwise be expected to make their own arrangements. This includes street homeless people, and those at risk of street homelessness, regardless of their local connection, immigration status, eligibility or priority need. While the vast majority of these households have been single people, there have been some couples, families with non-dependent children and families who may otherwise have been considered ineligible, or to have made themselves intentionally homeless.
- 1.4 Homeless people who have been provided with accommodation since March 2020 have been made aware that this is discretionary. However, alongside other London boroughs, Haringey is adopting the SWEP 'In For Good' principle, i.e. making a commitment to prevent a return to street homelessness for all who have been placed. The Council's exit strategy has been developed to enable this, to make best use of available funding and other resources, and to note where further resources are required.
- 1.5 Along with other London boroughs, the GLA and NHS, Haringey contributed to the development of the pan-London Rough Sleeping Exit Strategy, which has been supported by the Government's Rough Sleeping Taskforce. Haringey supports its seven principles and has developed its emerging Exit Strategy to deliver these at the local level, that is:
 - That no-one who has been placed in emergency accommodation in response to the Covid-19 public health crisis is asked to leave that emergency accommodation without an ongoing offer of support to end their rough sleeping
 - That there is the capacity and capability to deliver and implement In For Good offers of support

- To ensure continued protection from Covid-19 for those who need it
- To ensure that responsibility is shared fairly across London boroughs, and that none are disproportionately impacted by hosting rough sleepers from outside their boroughs
- To ensure a London-wide approach supports and complements the efforts of individual boroughs and providers, and vice versa
- To ensure an integrated housing approach with health and care to secure access to services and continuity of care
- To ensure that the roll out is gradual, to avoid a 'cliff edge' and overload of services as lockdown is lifted

1.6 Haringey has also noted MHCLG's announcement that £160m of capital and revenue funding, from the overall £431m funding to help rehouse Rough Sleepers, has been brought forward into 2020/21. While details on the allocation/bidding process are not yet known, work is underway to develop schemes which deliver the exit routes outlined below, which could be extended or accelerated with the support of this funding.

2. HARINGEY'S RESPONSE

2.1 Since 23 March 2020 Haringey Council has secured more than 13,500 nights of emergency accommodation for more than 420 adults. There are currently – as of 2 June 2020 - 375 single people living in emergency accommodation. The impact of this effort was evidenced in May, when as part of its bi-monthly street count, the Council recorded only nine people sleeping rough, its lowest recorded figure.

2.2 During this period, the Council will have spent around £1.6m on the provision of emergency accommodation and subsistence for these single homeless households by the end of June 2020. As well as providing immediate emergency accommodation, the Council immediately implemented needs and housing options assessments to help residents secure positive long-term housing options, for example by securing more settled accommodation or returning to live with family and friends. In effect, the Council has always been in "exit strategy mode", and this Strategy document represents the articulation of that effort and as well as our plans to broaden and scale up that work.

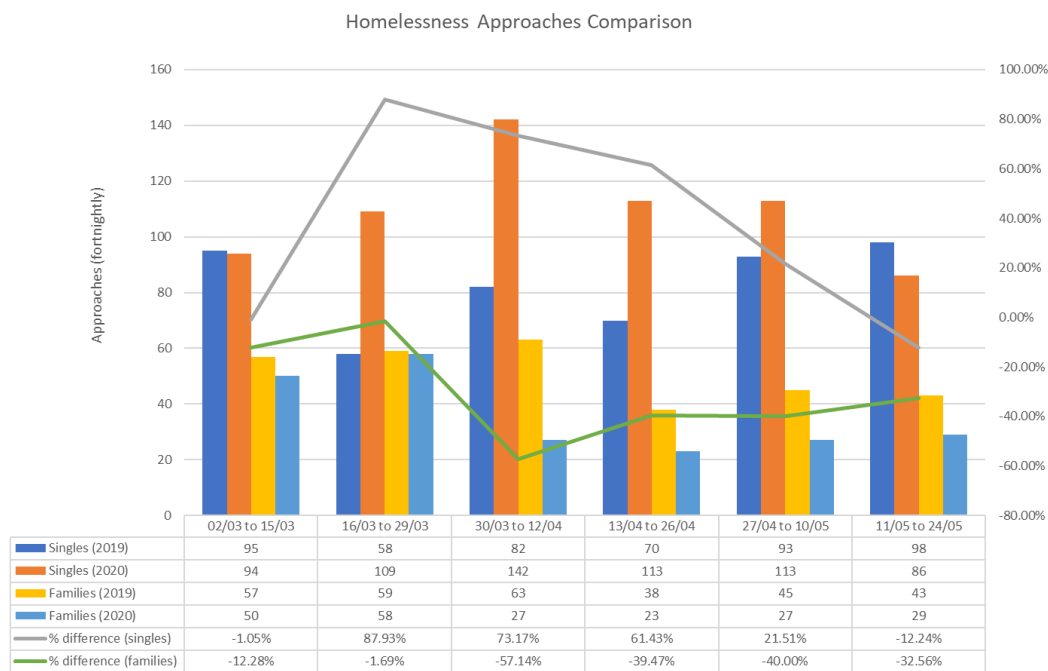
2.3 The majority of emergency accommodation has been in commercial hotels. B&Bs and hostels have each provided a little less than 10% of the total emergency accommodation sourced. And while an average of 9 people move-on from our emergency accommodation each week, there remains a net increase of around 20 placements every 7 days.

2.4 It is noted that 81% of these accommodation placements are in Haringey and neighbouring boroughs, up from 40% in early May. It is also noted that only 20 of those placements were in the 900 plus units secured by the GLA.

2.5 Haringey has the third highest rate of placements in London and the highest in the North Central London sub-region. In particular Haringey is an outlier in the

number of people placed who are unverified rough sleepers (i.e. not previously recorded ‘bedded down’ by an outreach team). This appears in part because of a significant issue with hidden homelessness in the borough, driven by high levels of overcrowding, which Covid-19 has brought to the fore. Haringey has fully adopted the requirement and spirit of Luke Hall MP’s directive in this regard, providing accommodation to everyone affected by street homelessness and those at risk of street homelessness. However, the Council is constrained by a lack of available accommodation options, due to a shortage of available social rented homes and over-subscribed supported housing pathways.

2.6 The table below sets out a 12 month comparison in homelessness approaches from single people and families over the period 2 March to 24 May in 2019 and 2020. This demonstrates the substantial increase in single presentations and notable decline in family presentations during lockdown. Ordinarily, the Council would have had a duty to provide accommodation to only 33 of the single people who have approached the Council since lockdown began.



2.7 Monitoring of the numbers of people placed shows that:

- 134¹ people (33%) have been CHAIN verified rough sleepers and were street homeless at approach. Around 70% of these have drug and/or alcohol needs.
- 123 people (30%) have been under 35 years old and 22 (5%) under 25 years old. Around 90% of these were not street homeless when they approached the Council but had nowhere to sleep that night so would have been sleeping rough if they had not been accommodated.
- 79 people (19%) would ordinarily not have been eligible for any assistance. The majority of this group are non-verified rough sleepers from EU states.

¹ These figures are subject to daily change and were accurate as at 28 May 2020

3. HARINGEY'S EXIT STRATEGY

- 3.1 Long term reliance on this emergency accommodation would not deliver quality outcomes for vulnerable people and is not financially sustainable for the Council. To achieve positive housing outcomes for this group, the Council will work to the exit strategy set out below.
- 3.2 The Council recognises that the large number of people who have been rehoused since March 2020 fall into different groups, with distinct needs and for whom different opportunities may be available. Therefore, the Council will be taking a "cohort-based approach" with a number of exit strategies being developed in parallel, which will be applied on a case by case basis to ensure the best chance of long-term success for each individual and most effective use of the Council's limited resources.
- 3.3 The Council also recognises that some people are able to move on more quickly than others, either because they are able to live independently with limited support or because the appropriate housing option is more readily available. Therefore, the Council will be taking an "easy wins" approach, looking to move on swiftly those for whom it is viable, but recognising that others, in particular those with the most complex needs and vulnerabilities, may need to remain in emergency housing for longer periods to secure an appropriate and sustainable outcome.
- 3.4 The Council is also working in the context of a chronic shortage of social housing in the borough, with over 9,000 households on the Council's housing register and 3,000 households in temporary accommodation. The Council is taking a lead in addressing this deficit by building new Council housing, but this will not be available in the timescales required to contribute to this Exit Strategy. And this shortage is pressured further by our decision to decant tenants from two blocks on the Broadwater Farm Estate for health and safety reasons. This has resulted in a further pressure on 1-bed social homes in the borough, which we have needed to prioritise for tenants transferring from the affected buildings.
- 3.5 The Council's Exit Strategy approach flows from the three factors outlined above:
 - A cohort-based approach
 - A sequential 'easy wins first' approach
 - An approach working within the constraint of the scarcity of social housing in Haringey
- 3.6 Delivery of this Exit Strategy is defined by a multi-disciplinary and partnership-based approach to providing the personal care and support that is essential to achieve effective and sustainable move on for this client group.

3.7 The main options for move on within this approach are:

- Private Rented Sector tenancies (with and without floating support, including house-share models)
- Supported housing
- Night shelters (local and sub-regional, commissioned and faith-based)
- Sheltered housing
- Returning to friends or family

3.8 It is worth noting that to date, around 20% of people in emergency accommodation are not engaging with the Council, so identifying the appropriate exit option is challenging. A series of visits to them in their emergency accommodation is planned, to seek to ascertain the best option.

A Private Rented Sector (PRS) tenancy is the identified exit strategy for nearly a third of those currently being housed.

3.9 Effectively, this involves the Council assisting residents who were homeless in March 2020, or who have become homeless since then, to find an assured shorthold tenancy in the private-rented sector. This exit route has been determined with the recognition that whilst people may require floating support to sustain their tenancy, the private rented sector is where immediately available accommodation can be found and this represents the best option for both residents and the Council.

3.10 There are costs associated with this exit option. As well as the officer time to source PRS tenancies and engage with residents, landlords and letting agents, it is expected that in a majority of cases the Council will need to provide either deposits for tenants or incentives for landlords, and in many cases both. It is estimated that this will cost £2,000 per person and will mean significantly extending the Council's existing Rent Deposit and Landlord Incentive schemes. In addition, Haringey has increased capacity in its Floating Support Service, bringing in three new staff for an initial six-month period. Given the number of people and range of needs, this is likely to require further expansion and identified funding to sustain this approach for the medium to long-term.

3.11 The Council is exploring house-sharing options for the cohort of people under 35 years old. This approach will seek to commission dedicated but low-level floating support for an initial period of three to six months. Support will be provided to match younger people together, and to assist with viewings and tenancy signings.

3.12 Additionally, Haringey is a founding member of Capital Letters and has tasked it with securing studio and one-bed properties for the purpose of delivering the In for Good principle.

Supported housing is the identified exit strategy for approximately 20% of the cohort of those currently being housed

- 3.13 The Council commissions a range of supported housing for single homeless households with support needs. However, with available funding reducing over the last ten years, supported housing in the borough is already over-subscribed. Although supported housing viability is a key aspect of modelling for all new build schemes, this will not deliver new supported housing provision within the timescales needed. To address this, the Council is in the process of commissioning 40 modular build supported housing units for short to medium term use for people leaving emergency accommodation who require further support.
- 3.14 It is also noted that two buildings currently providing emergency accommodation are earmarked for other purposes – both (Cranwood and Red House) are part of the Council’s housing delivery programme, intended to deliver much need Council homes at Council rents. A third building identified for emergency accommodation, Osborne Grove, has temporarily been returned to use as a nursing care provision in light of Covid-19 demands on the NHS and Adult Social Care and is not available for this cohort. .
- 3.15 The Council’s Housing-Related Support service has agreed the prioritisation of emergency accommodation referrals into its supported housing Pathways and into non-commissioned units in the North London YMCA foyer service.
- 3.16 The Council is also exploring options to lease properties on a medium-term basis to meet the need for supported accommodation. In particular, it is exploring a 25-unit contract with an offender resettlement service in light of the early release scheme and the known needs within the existing cohort in emergency accommodation.

Night shelters are the identified exit strategy for approximately 20% of the cohort of those currently being housed

- 3.17 Around 80 people within the emergency accommodation cohort are ineligible for assistance and have no recourse to public funds. These people are largely from EU nations but there is a small number of people from other countries also. This group are amongst the most vulnerable and socially isolated within the EA cohort.
- 3.18 Securing positive outcomes for this group is largely dependent on the reopening of night shelter provision, with 30 spaces in the borough currently closed. Initial discussions have been held with all these non-commissioned provisions and at present there is very limited opportunity to reopen services that are only able to provide dormitory style accommodation. While all the organisations have expressed a commitment to support the delivery of the In for Good Principle, there is concern that the provision of dormitory style accommodation is simply

no longer viable. Local relationships between the Council's Housing-Related Support Team and non-commissioned shelters are generally good, nonetheless there is no requirement for them to prioritise Haringey referrals and this represents a risk.

- 3.19 Sub-regional night shelter resource and resettlement support is available via Hope Worldwide, and the Council is liaising closely with the North London Housing Partnership to ensure this resource is fairly distributed across the sub-region for the purpose of achieving In for Good.
- 3.20 The Council's commissioned night shelter, Cranwood Hub, has expanded by 8 units during the lockdown period, including moving to a self-contained model. The Council is currently exploring the viability of an increase of a further 5 units. These units will be exclusively available to Haringey referrals and will be allocated for CHAIN verified EEA nationals with support needs as a priority.

Sheltered housing and returning to friends or family are the identified exit strategy for approximately 5% respectively of the cohort of those currently being housed

- 3.21 Haringey has a substantial stock of sheltered housing and is practised in using this to resolve homelessness for single adults with support needs over 50 years old. Demand for this provision is consistent but not at the level for general needs provision, therefore this offers a relatively swift housing outcome for older people whose needs can be met in sheltered housing.
- 3.22 There are an average of 10 sheltered housing lets per month and 23 current voids. Four of these are pre-allocated for people in emergency accommodation, with others already committed to older people on the waiting list. Future lets will be prioritised for those in emergency accommodation where possible.
- 3.23 To assist younger people in Emergency Accommodation to return home to family and friends, the Council has redeployed its Family Mediation service, funded from its Housing Related Support budget, to advise and support this group. The Council has a successful record in facilitating voluntary returns, including back to homes outside London, and this support service will be extended to help with move in from emergency accommodation.
- 3.24 It is estimated that up to 20 of people may return to live with friends or family abroad. However, this route off the streets is complex and notoriously prone to failure, therefore this option will be explored sensitively and comprehensively with those people for whom it may be relevant and desirable.
- 3.25 There are also around 50 people in the emergency accommodation cohort who are entrenched rough sleepers, who have had long periods living on the streets over numerous years. These individuals face significant inequalities around housing, health and welfare and require expensive wrap-around support and the flexibility of relevant services. For this group, the positive impact of providing

emergency accommodation, food and welfare during the lockdown period is truly ground-breaking and has enabled opportunities to form and strengthen relationships which would have been unimaginable previously.

- 3.26 Each of these individuals is being supported by a multi-disciplinary team to access primary care, acquire identification and start the process for claiming benefit entitlements, which are prerequisites for successful longer-term outcomes. Achieving this is not to be underestimated, and the Council is committed to a trauma-informed and relational approach to this work to achieve meaningful outcomes.

<p>The role of multi-disciplinary support in achieving effective and sustainable move-on</p>

- 3.27 A key element of the Council's work to provide accommodation and support to single homeless adults during the Covid-19 period has been understanding the range of support needs and vulnerabilities. A significant effort has gone into understanding the needs of capacities of those the Council has placed, and the multi-disciplinary input of statutory and voluntary partners has been instrumental in achieving this.
- 3.28 Whilst Covid-19 is undoubtedly a crisis, it has afforded the Council unprecedented opportunities to strengthen its relationships and working practices with colleagues in primary, acute and secondary health services in particular. It has also enabled the Council to generate 'systems flex' around access to drug and alcohol support, bloodborne virus screening and claiming welfare benefits. The input from practitioners and strategic leaders across the borough has had numerous individual and whole-cohort benefits, most obvious in the very low rate of infection within the homeless population.
- 3.29 For those people with especially complex support, care, and health needs the ongoing commitment to this work is crucial. Building on and embedding the work which has taken shape during lockdown will be a key strategic priority both in terms of achieving the Exit Strategy and in achieving the Council's longer-term vision to end rough sleeping in Haringey.
- 3.30 For some vulnerable residents, this multi-disciplinary case management approach will secure accommodation in adults social care provision, forensic mental health services and other forms of highly specialist accommodation with care. Whilst this only relates to a very small number of individuals, the social and economic benefits of this in-depth work are clearly understood by all involved and supported by the Haringey Safeguarding Adults Board, for whom homelessness is a strategic priority.

4. SCENARIO PLANNING AND KEY RISKS

- 4.1 A number of scenarios have been modelled for the exit strategy to identify the potential costs to the Council. While it is early in this work to make these assessments, it does show a potentially wide range of estimated costs, depending on how the strategy unfolds over the next year. These range from around £2.8m to just over £5.2m for the year period from 1 July 2020 to 31 March 2021, which is entirely over and above the £1.6m the Council is already projecting to spend by the end of June 2020.

Scenario until the end of March 2021	Cost
All current placements and provisions are maintained for 12 months	£ 5.2m
50% of placements and provisions are maintained for 12 months	£ 2.8m
All current placements are maintained for 12 months, but food and other provisions for those who are UC eligible or working is ceased	£ 2.1m
All provisions are ceased after the initial 3 months, except the entrenched rough sleepers in Haringey/Finsbury Park, which is maintained for 12 months.	£ 3.4m
All current placements and provisions maintained for 3 months, then: all ASTs are moved on by 6 months, all supported housing by 9 months and all ineligible by 12months	£ 3.7m

- 4.2 The Council recognises the public health benefits of the approach being adopted and support the Government's drive to effect a step change in our responses to street homelessness. This does not, however, come without wider costs and risks, not least the four set out below:

- a. **The availability of appropriate move-on accommodation** is the biggest single risk to successful implementation within the timescales required for this cohort, which – as identified above – has a range of support and accommodation needs to be met concurrently. For Haringey, we know that there is a shortage of permanent social lets, and that this is particularly acute for 1-bed and studio units ideal for this cohort. In addition, we have limited access to large hostels in the borough which at the moment are outside our direct line of influence, which we are seeking to change over time but again which will be affected by the timescales. The picture on weak supply could be exacerbated should there be an eviction spike post lockdown, which increases further the demand being held across the system and further complicates the balance between demand and supply.
- b. **The affordability of appropriate and long-term support** is a key factor. The Council is mindful that the original driver of the MHCLG's directive to local

government was to ensure a public health response in light of Covid-19, the long-term support needs of this cohort are key to future successful implementation. The complex needs of many members of this cohort are well rehearsed and the long term and multi-disciplinary responses needed are equally well understood. Such support has both a workforce and a financial aspect and we need to ensure that there is sustainable and long term funding in place to ensure that move on into accommodation is sustained with successful outcomes for this cohort across a range of areas including health and wellbeing, education and employment and social isolation.

- c. **The welfare benefit system** is a further risk to implementation. Housing Benefit Regulations have been currently loosened but in their standard form prevent backdated claims of over 4 weeks, cannot be paid without a license/tenancy agreement and cannot be claimed for nightly paid accommodation. This will affect the affordability for the Council in responding to the longer term needs of this cohort.
- d. **The lack of clarity about MHCLG's long-term policy intentions** is a risk in that it is undermining long term planning for this cohort and leading to uncertainty about responses to this cohort in the future.