Report for: Cabinet 6 March 2018

Title: Rough Sleeping Strategy

Report

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Planning and Development

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Commissioning

Ward(s) affected: All

Report for Key/

Non Key Decision: Key

#### 1. Describe the issue under consideration

- 1.1 The Council adopted a new Housing Strategy in November 2016, with a strategic objective to "Improve support and help to prevent homelessness". This set out a broad approach to homelessness, focusing on advice and prevention, alongside a new approach to temporary accommodation and the allocation of affordable housing.
- 1.2 Following joint work with the Homelessness Forum, the Council developed and consulted on a draft Homelessness Strategy between 14 November 2016 and 19 January 2017. However, a decision was taken to pause the formal adoption of the draft Homelessness Strategy, pending clarity around the implications of the Homelessness Reduction Bill (which received Royal Assent in April 2017) and levels of funding to be made available when the Temporary Accommodation Management Fee was replaced with the Flexible Homelessness Support Grant, again in April 2017.
- 1.3 This report sets out the new Rough Sleeping Strategy, which has been developed that consultation and subsequent further work with the Homelessness Forum, service users and other strategic partners. This new strategy sits alongside the new Homelessness Strategy.



#### 2. Cabinet Member Introduction

- 2.1 Homelessness is a blight on communities and individuals, with significant human and financial costs. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country and growing numbers of rough sleepers. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.
- 2.2 Our vision is that Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping. Our objectives are:
  - to reduce the financial and human costs of homelessness through intervening earlier to prevent homelessness, increasing the supply of accommodation available and meeting the needs of those already in Temporary Accommodation, and
  - to deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities - through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.
- 2.3 The draft Rough Sleeping Strategy presented here has been developed collaboratively with partners across the borough including statutory service providers, voluntary and community organisations, and people using our services. Officers will continue working closely with these groups and individuals as we develop our strategic delivery plan.
- 2.4 The Homelessness Strategy sets out our broad strategic vision, objectives and the overarching principles that inform our approach to addressing homelessness in Haringey, as well as summarising the harms and costs to people and communities caused by homelessness and rough sleeping. Our commitment to preventing homelessness at an earlier stage applies equally to single vulnerable people who may be at risk of rough sleeping as it does to families. However, in recognition of growing numbers of rough sleepers in Haringey, and the particular harms to people and communities that sleeping on our streets causes, we have developed a standalone Rough Sleeping Strategy to accompany the Homelessness Strategy. In this strategy, we identify an additional three priorities to those in the Homelessness Strategy, which we think are essential to effectively address rough sleeping in the borough.



#### 3. Recommendations

It is recommended that Cabinet:

- 3.1 Notes the Equalities Impact Assessment at Appendix 2
- 3.2 Approves the draft Rough Sleeping Strategy set out in Appendix 1, and, in particular, the priorities of the strategy which are as follows:
  - (a) Rapid intervention to offer a route off the street for all (as set out in section 7.4)
  - (b) Improving health, wellbeing and resilience (as set out in section 7.5)
  - (c) Tackling street activity (as set out in section 7.6)

### 4. Reasons for decision

- 4.1 Homelessness in Haringey remains a persistent challenge, with the second highest level of homelessness in the country. A radically different approach that drives whole systems change is necessary. Haringey needs a new culture for dealing with homelessness; rooted in honesty about what is and is not possible and based on finding solutions and offering support.
- 4.2 The strategic vision and priorities set out in the Rough Sleeping Strategy will guide our homelessness prevention and relief activities with partners and our communities over the coming years. The strategy is necessary to ensure our approach is appropriate, co-ordinated and that we are held to account on delivery.
- 4.3 The recommendation in 3.1 is to ensure the Council has met its duties under the Equality Act 2010.
- 4.4 The recommendation in 3.2 is to ensure that the Council specifically addresses the significant increase in rough sleeping in the borough and asks for a clear, distinctive and specific commitment from partners and residents.

### Alternative options considered

4.5 Not to produce a Rough Sleeping Strategy
It is not mandatory to have a standalone Rough Sleeping Strategy. However, there
has been a significant increase in rough sleeping in the borough. There has also
been an ask of the council for a clear, distinctive and specific commitment to
address this issue from partners and residents. Therefore, not having a standalone
Rough Sleeping Strategy would fail to signal the Council's intent on this issue and
its commitment to act on feedback from stakeholders.



## 5. Background information

#### **Strategic context**

5.1 Local Strategic context

This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the Corporate Plan notes, "We will provide realistic and achievable options for people to find housing or alternative housing." Further details of the local strategic context are set out in section 7 and in the strategy.

New legislation and responsibilities

5.2 Since the previous Homelessness Strategy, there have been a number of important pieces of legislation, including the Localism Act 2012, the Housing and Planning Act 2016 and recently the Homelessness Reduction Act 2017, which will come into force in April 2018. These are all reflected in the Rough Sleeping Strategy as appropriate.

Reduction in the incomes of households vulnerable to homelessness

- 5.3 There have also been significant changes to the ability of households to sustain private sector tenancies. This is partly because of new legislation, such as the Welfare Reform and Work Act 2016, which caps the maximum income households on benefit can receive. The Overall Benefit Cap limits maximum benefits that a London family can receive to £23,000 per year, for couples and families with children, and £15,410 for single people without children, with the benefit removed from the housing element. This has resulted in an average reduction of £14.16 a week in the incomes of Haringey's low-income working-age households.
- 5.4 At the same time private sector rents in Haringey have continued to rise faster than incomes, while the government has frozen increases in Local Housing Allowance (LHA) rates for 4 years from April 2016 meaning fewer properties are available within these rates.

Supply and demand for housing

- 5.5 Haringey continues to experience a high level of demand for help with housing. As at 1<sup>st</sup> November 2017, 3,049 Haringey households were living in council-provided temporary accommodation. A recent report by Shelter ranks Haringey as second only to Newham in having the highest rates of recorded homelessness in the country, with one in every 29 people in the borough either sleeping rough or living in temporary accommodation provided by the council.
- 5.6 In 2016/17, 967 households asked the council for help because they were threatened with homelessness. In 435 cases, the council was able to help them avoid becoming homeless. Homeless acceptances in Haringey have decreased from a peak of 762 in 2013/14 to 686 in 16/17, in contrast to the London picture of increasing acceptances over this period. Numbers in temporary accommodation have now started to reduce, largely due to success in preventing and relieving homelessness, with 3,049 households in TA on 1<sup>st</sup> November 2017. Loss of a private rented sector tenancy remains the most common reason for homelessness, alongside friends and family asking the person to leave.



5.7 Haringey's annual supply of new and relet social rented accommodation has reduced by 50% since 2011, so the Council cannot hope to meet the housing needs of those presenting as homeless through the allocation of social housing alone. Estate regeneration offers opportunities for new affordable homes to be built in Haringey; however, the benefits of these projects in terms of new affordable supply may not be seen for several years. The social rented sector accounts for just under 30% of properties in the borough with the remainder in the private rented sector. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

## **Funding context**

Flexible Homelessness Support Grant

- 5.8 Temporary accommodation costs for homelessness households have previously been met by central government through the Temporary Accommodation Management Fee (TAMF) paid through the Housing Benefit system. The overheated rental market in the capital led to this being increasingly topped up by boroughs' General Funds, reducing the ability of councils to fund other services. In Haringey, we currently spend c£7m of our General Fund on Temporary Accommodation.
- 5.9 Our ability to meet these targets depends on our ability to:
  - achieve ongoing reductions in the number of households entering Temporary Accommodation by preventing homelessness
  - reduce the length of time people stay in Temporary Accommodation by moving them on to alternative housing options more quickly – i.e. by increasing the supply of affordable private rented sector accommodation and empowering people to take these options up successfully
  - reducing the overall cost of Temporary Accommodation by, for example, obtaining better deals with landlords or purchasing open market stock
- 5.10 In April 2017, the Temporary Accommodation Management Fee (TAMF) was replaced by the Flexible Homelessness Support Grant (FHSG). The grant offsets the loss in Housing Benefit subsidy, with the remainder ring-fenced for 'work to prevent or deal with homelessness'. The new grant is intended to empower councils with the freedom to support the full range of homelessness services, based on what can be demonstrated to be effective locally. FHSG represents the primary source of additional revenue funding for the delivery of our Rough Sleeping Strategy.
- 5.11 Haringey has received its FHSG allocations for 2017/18 and 2018/19, with further announcements on 2019/20 expected in spring 2018. Officers anticipate the amount available in 2019/20 will be significantly reduced and are currently working to a projected allocation of £1.6m.
- 5.12 This funding is ringfenced for homelessness work, in as much the Ministerial Statement to both houses made by the Minister for Local Government on 15th March 2017 on announcing the funding identified that that "In order to manage the transition to a new funding regime carefully, we are ring-fencing the grant for two years to ensure it is spent on homelessness services" DCLG's covering email to



- the Haringey of 16th March 2017, accompanying the grant notification included the requirement that: "The grant is ringfenced for an initial period of two years and during that time may be used only to prevent or deal with homelessness"
- 5.13 The Housing Benefit offset for 2017/18 that must be paid for from the FHSG is projected to be £2.9m. In addition £800,000 of the 2017/18 funding will be used to offset the General Fund overspend on temporary accommodation. Future funding allocations are likely to be closely linked to Council's proven ability to spend these resources effectively to prevent homelessness at scale.

### Other funding available

- 5.14 Haringey has been allocated £1,235,883 'New Burdens funding', spread over the three years 2017/18 to 2019/20, in order to meet the requirements of the new Homelessness Reduction Act.
- 5.15 Using its General Fund, Haringey already commissions a range of services offering both accommodation and community-based support to vulnerable people. These services aim to prevent homelessness and promote independence, enabling people to remain in the community rather than be forced into more expensive institutional settings such as residential care or hospital. Over the three years 2017/18 to 2019/20 this amounts to £11,776,387.
- 5.16 In addition, in 2017, DCLG awarded Haringey £397,875 over 3 years to deliver a range of new services to address the growing levels of rough sleeping seen in the borough.

### Consultation and strategy development

- 5.17 Following the publication of the Housing Strategy, the council consulted on a new Homelessness Strategy as part of its wider consultation on policies to meet housing need – alongside the Allocations Policy, the Tenancy Strategy and intermediate housing. This consultation took place over 9 weeks between 14 November 2016 – 19 January 2017 and received 328 responses.
- 5.18 Over 11,000 council tenants, temporary accommodation residents, sheltered accommodation residents and households on the housing register were emailed and invited to take part in the consultation. There were a series of public drop in events, held throughout the borough during November and December 2016, where information was provided to residents on the policy proposals and assistance given in completing the questionnaire. A total of 135 residents attended the four public drop-in events.
- 5.19 The consultation was advertised through both Haringey Council and Homes for Haringey websites, the Bridge Renewal Trusts Community Impact Bulletin. Paper copies of the consultation booklet were available at Station Road, Marcus Garvey and Wood Green customer service centres where customer services officers were asked to inform tenants about the consultation. In addition, all Homes for Haringey resident groups in the Borough were contacted.
- 5.20 The results of the consultation are outlined below. As the consultation was one that consulted on four key housing policies, only the questions related to the



Homelessness Strategy have been included below. The table below outlines the results. A total of 328 residents responded to the consultation.

Question	Agree	Disagree
Question 2a: Do you think that the extent and cause of	57%	43%
homelessness in the borough have been correctly		
assessed in the plan?		
Question 4a: Do you think the plan has accurately	58%	42%
assessed the impact of homelessness demand, for		
example, the amount of temporary accommodation		
required and the support homeless households need in		
moving on to a settled home?		
<b>Question 5a</b> : Do you think the plan correctly analyses	64%	37%
rough sleeping in the borough and included actions which		
will reduce it?		
Question 6a: Does the plan include the right priorities?	66%	34%
Question 7a: Does the plan include the right actions to	71%	29%
deliver out priorities?		

- 5.21 There was support for the priorities and actions in the Draft Homelessness Strategy as well as the Council's assessment of housing supply and demand and its analysis of rough sleeping in the borough. Most respondents took the opportunity to comment on their personal circumstances but recurring themes included the need for the council or its partners to build more genuinely affordable housing and for some sort of rent control to be introduced in the private rented sector, to reduce or stop rents from increasing.
- 5.22 A presentation on the findings of this consultation was made to the Overview and Scrutiny Committee on 9<sup>th</sup> February 2017 and the accompanying report is attached at Appendix 3.
- 5.23 The consultation was also presented and promoted to partners at a series of forums. In particular, the Council worked in partnership with the Homelessness Forum and Core Group to develop the strategies, including setting out the strategic vision, overarching principles, and priorities. The Forum included workshops on the strategy before, during and after the formal consultation period from 14 November 2016 to 29 January 2017.
- 5.24 Following the public consultation, a decision was taken to pause development of the Homelessness Strategy pending more detail on the Homelessness Reduction Act becoming available. The Homelessness Reduction Act received Royal Assent in April 2017 and a revised draft Homelessness Code of Guidance was published in October 2017. The strategy has been refined and updated to reflect the implications of the Act and the new guidance, and other key changes since the draft was initially published, such as the new Supported Housing funding regime. During this time, the Council has undertaken further consultation events with key stakeholders from across the partnership and with people using homelessness services.
- 5.25 The Homelessness Forum was strongly of the view that the Council should produce a separate Rough Sleeping Strategy, to address this growing issue with



- specific challenges for the borough. The Forum also encouraged the Council to prioritise exploring hidden homelessness, in light of this too becoming an increasing problem that needs to be addressed.
- 5.26 A Rough Sleeping Strategy consultation process was then undertaken with professional stakeholders including Community Safety & Enforcement, the Metropolitan Police, Public Health, Homes for Haringey, Bringing Unity Back into the Community (Bubic), The Grove, Haringey Advisory Group on Alcohol (HAGA), accommodation providers, Thames Reach and St. Mungo's. The consultation involved three workshops, namely: identifying the key priority areas for the strategy, recognising the assets and strengths we have within Haringey and deciding what our strategic goals should be. Part of this exercise was to look at the need more information and data to inform policymaking and delivery.
- 5.27 The key themes that arose through the consultation were the need for a single homeless hub, for greater capacity within our outreach team, for an accommodation pathway that better meets the needs of its users, and for the process to access help to be less bureaucratic and more flexible for rough sleepers and single people with multiple and overlapping disadvantages. These recommendations are reflected in the Rough Sleeping Strategy.
- 5.28 A further Rough Sleeping Strategy consultation process was also held with a number of former rough sleepers in a mixture of one-to-one sessions and in a focus group. These consultations involved discussions on: what could have been done to prevent the individuals ending up on the streets, what worked for them whilst on the streets and their priorities.
- 5.29 One key theme that arose in this part of the process was that there were times for all individuals where, if the appropriate support had been given, the rough sleeping could probably have been prevented. As a result, the need for more prevention support appears heavily in the Rough Sleeping Strategy. Further themes were around the need for greater support with physical and mental health. Again, commitments are made in order to address these in the Rough Sleeping Strategy.

#### Main themes of the strategy

5.30 The Rough Sleeping Strategy sets out four ways in which the Council intends to change the way it works to enable it to deliver its objectives on homelessness and rough sleeping. It then goes on to then identify three key priorities for delivery.

How we will change what we do:

- 5.31 Providing strategic leadership and building collaborative partnerships: The council cannot deliver the outcomes needed on its own. Its role is to act as a platform, building capacity, sharing information and providing direction, enabling all the players to come together to deliver change. This will require us to build trust and transparency and deliver consistent messages across the partnership.
- 5.32 **Making prevention everyone's responsibility:** The best way to tackle homelessness is to prevent it from happening in the first place. All members of our partnership, including homeless people themselves, have a role to play and responsibilities in this. We must find new ways to integrate our homelessness



- prevention work with other services who also meet people in housing need, enabling us to intervene earlier and more effectively.
- 5.33 Commissioning more effectively to better meet local need: We will use modern strategic commissioning practices to better understand local need, effectively manage resources and plan and deliver services. These practices will deliver improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.
- 5.34 **Delivering in and with our community:** Our approach to addressing homelessness recognises the strengths and assets that individuals and communities already have within them. Our offer of help will build on these strengths, empowering individuals and communities to build their resilience and self-sufficiency so they are less dependent on services in the future.

Rough Sleeping Strategy priorities

- 5.35 **Priority 1. Rapid intervention to offer a route off the street for all:** The Rough Sleeping Strategy acknowledges that it is unacceptable for people to be sleeping on the streets and pledges to intervene quickly and offer everyone a route off the street. The approach proposed to achieve this includes: increasing our capacity to identify people earlier, improving the support we offer to help the person off the street and, as a last resort, taking co-ordinated enforcement action to prevent ongoing harm to individuals and communities. In acknowledgement that there is no 'one size fits all' approach to which route off the street will be right, the strategy commits to explore the full range of appropriate options and offer holistic support to address other, overlapping issues.
- 5.36 **Priority 2. Improving health, wellbeing and resilience:** The Rough Sleeping Strategy commits to working with partners to reduce the severe health inequalities faced by rough sleepers. We intend to achieve this by improving data collection, increasing access to health services and refocusing on health, wellbeing and resilience outcomes. In addition, there is a commitment to undertake a health needs audit and create a health 'passport' to improve our understanding of and track outcomes for single homeless people in our supported housing pathway. Alongside this, there will be efforts made to ensure Haringey services meet the 'Psychologically Informed Environment' (PIE) standard.
- 5.37 **Priority 3. Tackling street activity associated with rough sleeping:** The Rough Sleeping Strategy commits to developing a coordinated approach to tackling street activity associated with rough sleeping such as begging, street drinking and drug taking, ensuring that the harms this behaviour causes are minimised. It also outlines a commitment, as a last resort and in coordination with ongoing offers of support, to take enforcement action against individuals or groups who persist in such behaviour. There is also an assurance in place that vulnerable people displaced as a result of enforcement action are protected and have a plan in place to prevent them rough sleeping.

#### Contribution to strategic outcomes

5.38 This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the



- Corporate Plan notes, "We will provide realistic and achievable options for people to find housing or alternative housing."
- 5.39 The Corporate Plan Priority 5 includes the objective to "Prevent homelessness and support residents to live fulfilling lives" and aims to assess success in this objective by measuring both the number of households where homelessness has been prevented and the number of households who have been helped into settled homes, whether in the social rent or private rented sector. The Homelessness Delivery Plan aims to drive this objective forward and improve performance in this area.
- 5.40 As set out in the report, this policy supports the delivery of Objective 2 of Haringey's Housing Strategy 2017-2022 Objective 2 Improve support and help to prevent homelessness:
  - Provide timely and effective housing advice to help those in crisis or threatened with crisis to sustain their existing accommodation if possible. This will be at the first point of contact with the council and its partners but increasingly we want to intervene before an approach is made, where risk of homelessness can be identified.
  - Act at all times to prevent homelessness but where current accommodation cannot be sustained, to provide advice on realistic options and assistance to secure suitable affordable accommodation.
  - Provide suitable and affordable emergency or temporary accommodation when necessary, in accordance with fair and transparent criteria, while overall reducing the number of households in temporary accommodation and the cost of it to the local taxpayer.
  - Allocate council tenancies and intermediate tenures in accordance with fair and transparent criteria, both at the commencement and when reviewing the expiry of a fixed term council tenancy



### 6. Statutory Officers comments

#### **Finance comments**

- 6.1 This proposed strategy would give the Council a clear direction in tackling rough sleeping in the borough. Failure to respond to the homelessness crisis could result in continuing pressures on Temporary Accommodation budget.
- 6.2 The pressures faced in relation to increasing homelessness and temporary accommodation has been widely reported. These pressures, together with savings anticipated from measures being implemented have been included in the Medium Term Financial Plan.
- 6.3 Any financial implications arising from the Homelessness Reduction Act will be reported to Members alongside the established budget monitoring and performance monitoring reports.
- 6.4 The actions and activities set out in the detailed strategy and framework will be funded from existing budgets and Flexible Homelessness Support Grant (FHSG).
- 6.5 There has been one-off funding agreed from FHSG in 2017/18 to support work on prevention as identified in the strategy and action plan. Where appropriate, and reducing spending pressures, other investment supporting the strategy may be funded on an "Invest To Save" basis". Financial implications will be developed alongside such proposals.

### **Procurement comments**

6.6 Strategic Procurement notes the contents of this report and the associated strategy documents. Strategic Procurement will provide the required support to assist the council in the delivery of this strategy; however, it should be noted the commissioning of temporary accommodation is an activity that is undertaken by Homes for Haringey, with Strategic Procurement providing limited support in developing this category.

### **Legal comments**

- 6.7 The Assistant Director for Corporate Governance has been consulted in the preparation of this report and comments as follows. Legal Implications are otherwise set out in the body of this report. He sees no legal reason why the Recommendations should not be followed.
- 6.8 There is no legal requirement for the Council to maintain a Rough Sleeping Strategy as such. That Strategy sits as a discrete part of the main Homelessness Strategy.
- 6.9 The Homelessness Reduction Act 2017 ("the new Act") imposes upon local housing authorities new "assessment" "prevention" and "relief" duties to those whom the authority is satisfied are eligible and either homeless or threatened with homelessness within 56 days. These duties require authorities to:



- provide personalised written housing assessments including agreed plans setting out the steps that the authority considers it and the applicant should reasonably take to secure accommodation for the applicant ("assessment")
- take reasonable steps to help an applicant threatened with homelessness to secure that their accommodation does not cease to be available ("prevention")
- take reasonable steps to secure that suitable accommodation becomes available (for at least 6 months) to a homeless applicant ("relief")
- 6.10 These new duties apply to all those who are homeless or threatened with homelessness, irrespective of whether they have a priority need; and apply in addition to the existing duties to those who are in priority need.
- 6.11 The new Act also places a duty upon specified public authorities (to be specified by statutory instrument, but expected to include a range including the armed forces, hospitals, prisons and other institutions) to refer those whom they believe may be homeless or threatened with homelessness, and who agree to be referred, to the local housing authority of the applicant's choice. The draft Code of Guidance issued by the MHCLG recommends that local housing authorities set up procedures to deal with these referrals, including establishing protocols with likely local referrers.

### **Equality comments**

- 6.12 The council has a public sector equality duty under the Equality Act (2010) to have due regard to; tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation); advance equality of opportunity between people who share those protected characteristics and people who do not; and foster good relations between people who share those characteristics and people who do not.
- 6.13 The potential impact of the new strategy has been assessed during and after consultation. The Rough Sleeping Strategy identifies particular groups at risk of rough sleeping, including those with protected characteristics. The Equality Impact Assessment (EqIA) sets out how the Rough Sleeping Strategy address the needs of these groups. The EqIA is attached as Appendix 1.



## 7. Use of Appendices

Appendix 1 Proposed new Rough Sleeping Strategy

Appendix 2 Equalities Impact Assessment

# 8. Local Government (Access to Information) Act 1985

Background papers:

Corporate Plan 2015-2018

http://www.haringey.gov.uk/sites/haringeygovuk/files/corporate\_plan\_2015-18.pdf

Housing Strategy 2017-2022

http://www.haringey.gov.uk/sites/haringeygovuk/files/housing\_strategy\_2017-2022.pdf

Homelessness Strategy 2012-14

http://www.haringey.gov.uk/sites/haringeygovuk/files/homelessness\_strategy\_2012-14.pdf

Overview and Scrutiny Panel report February 2017 "Consultation on Four Policies to Meet Housing Need"

http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=128&MId=8066&Ver=4

