

Item No. 10.	Classification: Open	Date: 6 March 2024	Meeting Name: Cabinet
Report title:		Draft Homelessness and Rough Sleeping Strategy	
Ward(s) or groups affected:		All	
Cabinet Member:		Councillor Helen Dennis, New Homes and Sustainable Development	

FOREWORD - COUNCILLOR HELEN DENNIS, CABINET MEMBER FOR NEW HOMES AND SUSTAINABLE DEVELOPMENT

We are in the midst of an escalating crisis in housing and homelessness, with a record number of households, including children, in temporary accommodation in England, and rough sleeping also on the increase across London. An increase in S21 no-fault evictions, the cost of living crisis, insufficient Local Housing Allowance (LHA) and challenges around Home Office cases have been fuelling an increase in homelessness applications, whilst at the same time it is becoming increasingly difficult for the council to procure accommodation in a timely manner that meets the needs of local people. The financial implications of this for local authorities are well documented, and in some local authorities, it is also leading to the use of Bed & Breakfast accommodation for extended periods of time, and out of area placements, which are further and further way from a person or family's support networks. This is being fuelled by factors outside of local authority control, but we remain committed in Southwark, to providing the best possible service to those who find themselves in housing need and using our limited resources in the most effective way possible.

In order to achieve this, our draft Homelessness Strategy which is published here for statutory consultation, sets out our overarching goal, *“to work to end homelessness through the delivery of timely, effective and collaborative support which enables Southwark residents to address their housing insecurity”*. This goal underlines the importance of partnership – in Southwark facilitated by our Homelessness Forum – and of early intervention, to support residents before they reach crisis point. The draft Strategy sets out three underpinning objectives and organises our response under five priority headings. Firstly, we want to be **data-led**, and this draft Strategy is informed by a comprehensive Data Review which examines the challenges and trends specific to Southwark. As an example, we continue to have a much higher number of homelessness presentations from single men, and applications that result from eviction from friends and family. Secondly, we want to ensure that advice and support is **effective** and **timely**, and thirdly, we want to be **outcomes-focused**, always learning and open to how we can improve the quality of our support.

Our five proposed priorities as set out in the draft Strategy are to:

- 1) Prioritise Homelessness Prevention
- 2) Deliver High Quality Advice and Support
- 3) Work to End Rough Sleeping
- 4) Achieve Quality Outcomes through Housing Provision
- 5) Tackle Systemic Housing Insecurity.

These priorities are supported by an Action Plan which we will work through with partners in our Homelessness Forum and also through a recurring roundtable, chaired by myself as the lead Cabinet Member to support delivery. Among other things, we want to strengthen the referrals process, develop a bi-monthly prevention forum, and explore co-location and outreach for early advice in the community. We are actively exploring options for a post-COVID service delivery model, for expanding the Housing First team, to improve pathways through supported housing, and as a demonstration of our commitment to service improvement, we want to establish ways in which service users can provide further feedback and insights to the council.

Delivering a successful strategy is not just about our Housing Solutions team. It is about the many partners that we work with on a daily basis to address homelessness, and also about a cross-departmental approach. Our ambitions here are supported by our Exchequer Team who continue to provide Cost of Living support and administer Discretionary Housing Payments, by Adults' and Children's who commission our specialist services and support our care leavers, by a Housing Department which continues to manage the largest stock of council housing in London, and ultimately by a Council which is committed to delivering as many homes at social rent as possible, including through our council house-building programme which to date has delivered 3000 new homes either completed or on site. In the end, efforts to end homelessness will only succeed when all branches of government pull in the same direction. We had a glimpse of what is possible via the 'Everyone In' initiative, and it is our hope that through this strategy, supported by wider policy changes, we will see an end to this crisis and better outcomes for everyone in housing need.

RECOMMENDATIONS

Recommendations for the Cabinet

1. That Cabinet note the re-drafted Homelessness and Rough Sleeping Strategy (Appendix 1), re-drafted supplementary data review (Appendix 2), re-drafted engagement and consultation plan (Appendix 3), equalities impact and needs analysis (Appendix 4) and re-drafted action plan (Appendix 5.)
2. That Cabinet agree actions and priorities arising from the draft Homelessness and Rough Sleeping Strategy.
3. That Cabinet approve the re-drafted Homelessness and Rough Sleeping Strategy for formal consultation and the Strategy should be brought back for consideration by the decision maker with the consultation outcome.

BACKGROUND INFORMATION

4. The Homelessness Act 2002 places a duty on housing authorities to conduct a review of homelessness in their area every five years and develop a homelessness strategy based on the findings of that review.
5. Southwark Council's homelessness statutory duties are primarily set out in the Housing Act 1996 (as amended.) Part 7 of the Housing Act (1996) sets out the definition of homelessness, and the duties that local authorities owe to applicants who are accepted as being homeless or threatened with homelessness.
6. The Council has an interim duty to provide accommodation while it makes inquiries, if there is reason to believe that an applicant may be eligible, homeless and in priority need. Accommodation is arranged for the applicant until a decision has been reached on their application.
7. If the Council decides that it owes the 'main homelessness duty' to an applicant, they will be offered temporary accommodation until they find their own accommodation or are made a final offer of accommodation, or the duty ends in another way.
8. **The Localism Act (2011)** also amended the 1996 Housing Act by allowing local authorities to discharge their homelessness duty by arranging a suitable offer of accommodation in the private rented sector.
9. **The Homelessness Reduction Act (2017)** made significant changes to the Housing Act (1996) and placed a number of new duties upon local authorities. These include:
 - To assess the cause of homelessness, circumstances and needs of all household members, including children.
 - To develop and agree with applicants a personalised plan of the steps that will be taken to prevent or relieve homelessness.
 - Extending the time frame a household is threatened with homelessness from 28 days to 56 days, meaning that local authorities have a duty to prevent homelessness from an earlier stage.
 - New duties to assess all eligible applicants (not just those unintentionally homeless and in priority need), and new duties to take reasonable steps to prevent and relieve homelessness.
 - A duty on public authorities to refer service users who may be homeless or threatened with homelessness to the housing authority (with the consent of the individual.)
 - Services must be designed to meet the needs of specific groups including care leavers, people leaving hospital / prison and victims of domestic abuse.
10. **The Domestic Abuse Act (2021)** places a duty on local authorities in

England to provide support to victims of domestic abuse and their children. It makes provision that all eligible homeless victims of domestic abuse automatically have 'priority need' status for homelessness assistance.

KEY ISSUES FOR CONSIDERATION

11. Southwark's existing Homelessness and Rough Sleeping Strategy of 2018-2022 set out an overall aim to deliver an innovative, leading and accessible service to prevent homelessness and assist homeless households in finding long term, affordable and sustainable housing.
12. Southwark has achieved a number of key objectives to fulfil its strategic aims through the course of the subsequent years, most notably changes implemented to its procedures, in order to meet the requirements of the Homelessness Reduction Act 2017.
13. Since the implementation of our last Homelessness & Rough Sleeping Strategy, there has been significant change in the way our services are provided as a result of the pandemic. The needs of our residents have also been affected by the UK's departure from the European Union, the cost of living crisis, the energy and housing crises and global uncertainty from the war in Ukraine.
14. Through the course of 2022, 2023 and so far this year, Housing Solutions has gathered a wide range of data to help understand the changing needs of our residents, our performance to meet these needs effectively between 2018-2022 and to highlight the legal and policy changes that have affected both. Our current review document can be found in appendix 2. Since the bulk of the Data Review was undertaken, we have observed challenging trends affecting the number of homelessness approaches, the availability of affordable properties in the private rented sector and as temporary accommodation, and leading to an increase in rough sleeping. Our response to the latest data is integrated into our strategy and action plan.
15. From our data review, we formed 5 draft priorities to address the existing and emerging needs within the borough. These have been presented and reviewed throughout a period of informal consultation with over 30 partners spanning the Council, statutory and voluntary partners and service users. From this, a great wealth of insight and feedback has been collected and grouped thematically to arrive us at a point of a draft strategy.
16. The initial draft strategy was agreed at Housing Board and supplementary papers were agreed on 25 October 2023. Following this, the item was reviewed at Cabinet and Housing and Community Safety Scrutiny Commission in December 2023. From these reviews, we have made further revisions to the draft strategy, data review, engagement and consultation plan and action plan.
17. Aligning with Southwark's wider strategic aims and commitments we have re-defined the following strategic aim:

To work to end homelessness through the delivery of timely, effective and collaborative support which enables Southwark residents to address their housing insecurity.

18. From this aim, we have identified 3 overarching objectives:
 1. ***To use a data-led and joined up approach with our partners to identify and support those at the earliest stages of housing difficulty.***
 2. ***To ensure effective and timely advice and support is provided to help make real and lasting change for our residents.***
 3. ***To improve the outcomes for residents in the quality of our support and work together to tackle the root causes of homelessness.***

19. To achieve these objectives, we have identified the following 5 priorities, that seek to both deliver many elements of our last strategy and focus efforts and resources to overcome the challenges we've seen and are likely to see in the next 5 years:
 1. **Prioritise Homelessness Prevention** – *Using a data led and joined up approach to prevent homelessness and sustain existing accommodation arrangements where possible.*
 2. **Deliver High Quality Advice & Support** – *Ensuring high quality, tailored, trauma-informed, effective advice and support is delivered promptly to address the diverse needs of our residents.*
 3. **Work to End Rough Sleeping** – *Expanding Southwark's off the street provision for rough sleepers and those with complex needs, prioritising Housing First, and working with partners to address the causes of rough sleeping.*
 4. **Quality Outcomes Through Housing Provision** – *Making best use of accommodation available that meet the needs of our residents, supports their health and wellbeing, and continue to drive up standards.*
 5. **Tackling Systemic Housing Insecurity** - *Working with partners to address the wider determinants of housing insecurity including through advocacy, and empowering residents to make informed decisions in resolving their housing issues.*

Policy framework implications

20. The proposed strategy takes account of the existing overarching Council policies:

- Contribute to the delivery of the Council's Fairer Future Promises, particularly the promise to deliver 11,000 new council homes by 2043, as well as investment plans for the council's housing stock.
- Provide clear leadership and management to ensure the council is able to deliver commitments as set out in the Housing Strategy 2013 – 2043 and the action plans contained therein.
- To align and support Southwark's existing Allocations Policy of 2013 and its next iteration in 2024.
- To align and enhance the Council's commitments of Southwark Stands Together to ensure systemic inequality experienced by our Black, Asian and minority ethnic residents is addressed.
- To align and enhance the Southwark 2030 strategy and its 7 goals. Specifically to ensure the themes of improving access to suitable homes, connected neighbourhoods, access to employment and skills and improving health and wellbeing are all underpinned by our draft aims and activities.
- To align and support the Council's Temporary Accommodation Placement and Procurement Policies.
- To deliver Southwark's homelessness services within its budget and grant streams.

Community, equalities (including socio-economic) and health impacts

21. Section 149 of the Equality Act, lays out the Public Sector Equality Duty (PSED) which requires public bodies to consider all individuals when carrying out their day to day work – in shaping policy, in delivering services and in relation to their own employees. It requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities. The council's Approach to Equality ("the approach") commits the council to ensuring that equality is an integral part of our day to day business.
22. An Equality Impact Assessment (EIA) is attached at Appendix 3. The EIA identifies that certain groups are more likely to be affected by the policies, as they are more likely to present themselves to the council as homeless, these groups are:
 - Black, Asian and minority ethnic groups
 - The 25-44 age group (this group is also more likely to have children)
 - Women
 - Households with children/pregnant women
 - Children

- Lone parents
 - Low income households.
23. The strategy's focus on preventing homelessness and access to high quality and accessible advice generally will benefit these groups. Improvements to the access of advice around debt and entitlements for residents will likely mitigate the risks of housing insecurity or loss of homes. Improvements in the coordination of agencies through prevention forums, the better use of data to target interventions and expanding the network of the homelessness forum will help align and enhance prevention work for families in the Borough.
 24. We will be improving additional assessments to identify eligibility for supported accommodation and improving the move on plans of residents. We will improve the timeliness of access to specialist accommodation such as sheltered and extra care so the needs of those with disabilities can be met more quickly.
 25. We will also reintroduce a twice yearly Homelessness Roundtable, Chaired by our Cabinet Member, to bring partners together to assess the progress of all stakeholders' work against the strategy and our action plan. In conjunction with our strategic roundtable, Southwark will be initiating insight sessions through an expert panel of residents with lived experience of homelessness and housing insecurity to help inform and develop out work further.
 26. We understand that households disadvantaged by low income, physical and mental health problems and those of Black, Asian and Ethnic minority backgrounds will be at higher risk of housing insecurity. Our draft strategy and activities aim to provide effective high quality advice and support earlier to help residents avoid homelessness and improve their access to services, including improved support around employment and skills training.
 27. Overall the EIA concludes that where potentially negative impacts on households have been identified, not all of these can be mitigated, but that equality implications have been fully considered. It is required to consider the potentially negative impacts on protected groups and whether these impacts are justified by the council's wider objectives in implementing these strategic actions by using its resources to provide the best outcomes for the residents of the borough. The impact of the strategy and in particular the equality impact of the strategy will in any event be kept under regular review.

Equalities (including socio-economic) impact statement

28. In the course of our development and delivery of our strategy, we will be completing in-depth equalities analyses and our finalised strategy will be one that has equality of opportunity and outcome at its core.

Health impact statement

29. We will ensure our strategy promotes healthy outcomes for our residents and staff.

Climate change implications

30. We will ensure that wherever possible in the course of our strategic and underpinning operational objectives are consulted upon and agreed, developments to new ways of working will be considered to achieve our commitment minimize climate change.

Resource implications

31. The actions and activities set out in the strategy will be delivered within existed resources of the Council.

Legal implications

32. Legal implications are set out in paragraphs 40 - 46 below.

Financial implications

33. The actions and activities set out in the detailed strategy will be delivered within the agreed base budgets for Temporary Accommodation and Housing Solutions. The council also has many grant streams to support homelessness predominately to foster prevention and expand the offer for rough sleeping.
34. The service is seeing rising numbers of homeless, exacerbated by the cost of living crisis and the streamlined asylum process. In addition, there is an emerging and more serious pressure on the supply-side as providers are exiting the private rental market due to rising interest rates impact on the financial return, availability issues and rental costs to landlords are escalating. The council is taking practical steps to increase the supply of appropriate housing solutions including the use of empty housing stock and increase void turn-round times. The council is also actively reviewing its procurement strategy, use of its own council stock and examining alternative investment models to help increase supply as well as looking at how the allocations policy could assist with additional local provision.
35. It should be noted with the growing pressure on homeless demand, particularly with the result of streamlined asylum processing, this may result in increased pressure on rough sleeping. Expanding Southwark's off the street provision may need to be reviewed to ensure the offer can be met from existing resources or the grant offer from government departments. Further details of the available resources for tackling homelessness are outlined in Appendix 2.

Consultation

36. To help with reviewing and shaping the strategy, the service has presented the data review and draft potential priorities to key stakeholders to gain feedback in the homelessness forum held on 27th April 2023. The service also undertook an online informal consultation exercise on 5th, 11th and 19th July 2023 with over 30 internal and external partners working in the areas of housing, health, justice and welfare rights.
37. The service also held a housing solution service-wide conference on 26 July 2023 to present the draft priorities and activities and seek feedback. Finally, the service also held an in-person meeting with ex-service users with complex needs on 10 August 2023.
38. A formal engagement and consultation plan can be found in Appendix 3.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Head of Procurement

39. Not applicable.

Assistant Chief Executive Governance & Assurance (KM 2/2/24)

40. Legislation concerning homelessness reviews and strategies is set out in sections 1 to 3 of the Homelessness Act 2002 (“the 2002 Act”). Additional information about what is to be addressed in a homelessness strategy is set out in section 3 of the 2002 Act. The scope of what homelessness review should cover is set out in section 2 of the 2002 Act and section 2(3) of the 2002 Act, requires that the outcome of the Council’s homelessness review must be available for public inspection after its completion.
41. Section 1 of the 2002 Act provides that local housing authorities may from time to time carry out a homelessness review for their district and formulate and publish a homelessness strategy based on the results of that review. They must publish a new homelessness strategy within five years of the date of publication of their last homelessness strategy.
42. Section 3(7A) of the 2002 Act, stipulates that in formulating or modifying a homelessness strategy, a local housing authority shall have regard to—
 - a) its current allocation scheme under section 166A of the Housing Act 1996
 - b) its current tenancy strategy under section 150 of the Localism Act 2011 and
 - c) in the case of an authority that is a London borough Council, the current London housing strategy.
43. Section 188(1) of the Housing Act 1996 provides that, if a local housing authority has reason to believe that an applicant may be homeless, eligible

for assistance and have a priority need, the Council must secure that accommodation is available for the applicant's occupation until the homelessness application is processed and a decision is made by the Council regarding the application.

44. A local authority will owe a full homelessness duty to provide temporary accommodation if it is satisfied that a homeless applicant is homeless, eligible for assistance (this usually means not excluded on immigration grounds), in priority need of accommodation, and not intentionally homeless. The applicant will be required to have a local connection with the borough.

Rough Sleeping

45. The Council's strategy will also set out its approach to and commitments for addressing and eliminating rough sleeping. This includes details about how the council will work with other agencies and stakeholders in order to ensure that rough sleeping in the borough is addressed.
46. The Council will be carrying out consultation on the strategy. Consultation must take place at a time when proposals are still at a formative stage. Sufficient reasons must be provided for any proposal to allow time for review and feedback, and adequate time must be given for consideration and response. The outcome of consultation must be conscientiously taken into account in finalising then council's proposals.

Strategic Director of Finance

47. The Homelessness strategy aims to improve the effectiveness of service and there are no direct financial implications from this. It should be noted the council is seeing unprecedented pressure within the service due to the cost of living crisis and other external factors. The council remains fully aware of its statutory homeless duties and is taking a number of actions to increase supply to ensure they deliver this within the agreed resources and in the most cost effective and sustainable way.
48. The Rough Sleeping strategy is based on known funding streams and current numbers of rough sleepers but these may be liable to reduce or cease over time. In the event of changes to either of these factors the strategy may need to be reviewed and updated with further consultation if necessary.

Other officers

49. Not applicable.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
None		

APPENDICES

No.	Title
Appendix 1	Draft Homelessness and Rough Sleeping Strategy
Appendix 2	Data Review
Appendix 3	Draft Engagement and Consultation Plan
Appendix 4	Draft Equalities Impact and Needs Analysis (EINA)
Appendix 5	Draft Action Plan

AUDIT TRAIL

Cabinet Member	Councillor Helen Dennis, New Homes and Sustainable Development	
Lead Officer	Cheryl Russell, Director of Resident Services	
Report Author	Jerome Duffy, Programme, Policy and Change Manager	
Version	Final	
Dated	22 February 2024	
Key Decision?	Yes	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Strategic Director of Finance	Yes	Yes
List other officers here		
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team	22 February 2024	