LONDON BOROUGH OF TOWER HAMLETS

Homelessness Strategy 2018 - 2023

Draft Consultation Document – July 2018
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To be added, setting out the Council’s vision and aspirations.

2.0 Executive Summary

To be added when Strategy is finalised

3.0 Homelessness - the Local Strategic Context

3.1 LBTH Housing Strategy 2016-21

The London Borough of Tower Hamlet’s current housing strategy was adopted by the Council in December 2016, and covers a full range of housing issues that include meeting overall housing need, new housing supply including affordable housing, regeneration, tackling poor conditions in the private rented sector and a commitment to partnership working.

In relation to tackling homelessness, the Strategy committed the council to:

- Refresh our Homelessness Statement into a Strategy and align it with the 2016-21 Housing Strategy
- Reconvene the Homelessness Partnership Board which will assist with the production and delivery of the action plan, with monitoring being carried out by officers.

The housing strategy committed the council to consider other options to prevent homelessness, and to meet demand, including considering the options to reduce the number of homeless households from LBTH who are currently in temporary accommodation, a continued commitment to the no second night out objective (and through working with landlords and tenants, ‘no first night out’ either), developing council owned temporary accommodation, and using existing council and Registered Provider properties for short-term homeless housing where appropriate. It stated that a fundamental aspect of the new homelessness strategy will be to ensure the most vulnerable groups can be assisted, linking their support into health, education, employment and wellbeing.

The introduction of the Homeless Reduction Act has been described as one of the major pieces of homelessness legislation in the past 15 years by Shelter. Previously a person is defined as being threatened with homelessness if it is likely that they will become homeless within 28 days. The Homelessness Reduction Act 2017 increases the number of days from 28 to 56, including those who have been served with a section 21 notice that is the legal notice that must be served by a landlord notifying the tenant that possession of the private sector property is required. A period in which to negotiate with a landlord once the s21 notice has been issued is vital to prevent homelessness and find alternative
options, either through the same landlord or another, and is one of the ways in which our Housing Advice service has been successful in preventing homelessness.

3.2 About Tower Hamlets

Tower Hamlets is one of the fastest growing local authorities in the country, with its population expected to increase by 26% between 2016 and 2026. The increase in population brings with it significant housing challenges with the rising cost of living and housing and welfare reform, people in the Borough are being priced out of the borough and more at risk of becoming homeless. It also has one of the youngest populations in the country so there is a greater risk of younger people experiencing homelessness.

The average cost of a property in Tower Hamlets is now around 14 times what a typical essential worker earns. Tower Hamlets has the 12th highest average monthly rents in London, and one of the highest levels of poverty in the UK, with 44% of households in the Borough experiencing income poverty, high levels of deprivation and child poverty, and 67% of people living in the private rental sector living in fuel poverty.123

Ultimately, a sustained increase over the medium to long term in the provision of affordable rented accommodation (and associated supported housing) could lead to a reduction in homelessness. The recent increased amount of funding available to support the delivery of affordable rented housing in London is welcome and whilst the council is fully committed to continuing to support the delivery of amongst the highest level of affordable homes in the country we will continue to have significant homelessness issues to tackle.

The ending of Assured Shorthold Tenancies in the private rented sector is now the main cause of homelessness in London. This, combined with the freezing of local housing allowance since 2011 at a time when private rents in London have increased substantially has meant the private rented sector is an increasingly unaffordable and unsustainable housing option for people who are on average or low incomes and threatened with homelessness. This in turn is likely to result in homelessness continuing to have an upward trajectory.

Consequently, the council is facing challenges in its ability to procure affordable private sector temporary accommodation to fulfil its statutory duties to homeless households, resulting in a substantial increase in the cost of temporary accommodation to the council. Nevertheless there are occasions when suitable, affordable private sector options arise which can help prevent or relieve homelessness.

The availability of affordable private rented accommodation is likely to diminish, unless local housing allowance and temporary accommodation subsidy are increased to more closely match market rents. The council therefore needs to actively plan for a future with the objective of diversifying the supply of temporary accommodation thereby reducing the dependence on expensive private rented accommodation.

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1 2016-21 Tower Hamlets Housing Strategy
2 Tower Hamlets Housing Evidence Base, November 2016
accommodation and achieving an affordable pipeline of homes for the prevention and relief of homelessness. This will mean:

- Reviewing what accommodation we have access to now
- Creating our own portfolio of temporary accommodation and taking a strategic view on which areas this accommodation should be located
- Increasing the use of general needs accommodation for temporary accommodation purposes
- Securing our own emergency accommodation to reduce and ideally end the use of bed and breakfast accommodation
- Ensuring that available accommodation is allocated on need, and that the council exercises its powers and ensures its lettings policy enables an annual reduction in the number of households in temporary accommodation
- Proactively monitoring the financial welfare of households who are likely to be impacted by the benefit cap to prevent homelessness
- Responding to the demands arising from the Homelessness Reduction Act in which came into force in April 2018.

4.0 Defining Homelessness

Crisis defines Homelessness as follows:

“Homelessness is about more than rooflessness. A home is not just a physical space; it also has a legal and social dimension. A home provides roots, identity, a sense of belonging and a place of emotional wellbeing. Homelessness is about the loss of all of these. It is an isolating and destructive experience and homeless people are some of the most vulnerable and socially excluded in our society”.

Statutory Homelessness

If an individual or household is accepted by the local authority as meeting the criteria set out in the Housing Act 1996, they will be deemed statutorily homeless. Statutory homelessness may apply to people who have no access to housing of any type, or who have access to housing which is unsuitable for their needs. If the applicant is also deemed to be in priority need, the local authority has a duty to provide them with accommodation. If they are not in priority need, the local authority should provide them with housing advice.

Priority Need

A household or person is likely to be considered in priority need if:

- Children live with them
- They are pregnant
- They are aged 16-17 and do not qualify for housing from social services
- They are a care-leaver aged 18-21.

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4 Crisis
5 Housing Act 1996
6 Shelter 2017. Help from the council when homeless: Are you in priority need?
• They are homeless through disaster such as flood or fire
• They are a vulnerable adult

**Threatened Homelessness**

Threatened homelessness applies to those who are at risk of losing their access to housing within 56 days. They are entitled to the same services as somebody who is statutorily homeless. The ‘at risk’ period was increased through the Homelessness (Reduction Act) 2017 from 28 to 56 days.

**Hidden Homelessness**

The hidden homeless are those who do not have access to suitable housing, but may be staying with friends or family or living in squats, and are not known to services. This group may also include recent migrants, and those without recourse to public funds.

**Rough Sleeping**

Rough sleepers are those who sleep or live on the street. This is often the most visible manifestation of homelessness.

**5.0 National Context**

**5.1 The national picture and the rise in homelessness since 2010**

Homelessness has shot up the media and political agenda over the past year and all major political parties mentioned homelessness in their manifestos for the June 2017 General Election. The Conservative Government under Theresa May has pledged to halve rough sleeping by 2022 and eliminate it all together by 2027. The Prime Minister has also established a high-level Rough Sleeping and Homelessness Taskforce supported by an expert Rough Sleeping Advisory Panel.

Much of this recent attention is in response to the ongoing rise in the most visible form of homelessness - rough sleeping - with the officially estimated national total now up by 169% since 2010. The more robust statistics collected by the CHAIN system show rough sleeping in London has more than doubled since 2010, with the overall figure having reduced slightly since 2015. This decrease is mostly due to a sharp reduction in rough sleepers from Central and East European and other non-UK origin. However UK national rough sleeping numbers have continued to increase very slightly in this period.

Since 2009/10 annual homelessness acceptances have increased by 19000 across England and now stand at 59000, some 48% above the 2009/10 low point. Most of the recently recorded increase in statutory homelessness is due to the sharp rise in numbers made homeless from the private rented sector – an increase from less than 5000 to over 18000 in this period. As a proportion of all statutory homelessness acceptances, homelessness from the private rented sector has rose from 11% to 31% from 2009/10 to 2016/17. All available evidence points to Local Housing Allowance reforms as a major driver of this
association between loss of private tenancies and homelessness. These reforms have also demonstrably restricted lower-income households’ access to the private rented sector and this has impacted particularly in inner London.

Since bottoming out in 2010/11, homelessness placements in temporary accommodation have risen at twice the rate of homelessness acceptances. The overall national total has risen by 61% on the total six years earlier and a continuation of this trend would see placements topping 100,000 by 2020.

Specifically in LBTH, the Chain database shows that in 2010/11 some 156 people spent at least one night rough sleeping and in 2016/17 this figure had increased to 445 people. The all London figures being 3975 and 8108 respectively.

The Chancellor of the Exchequer reiterated a number of the government’s manifesto commitments around homelessness as part of his 2017 Budget speech. This included the commitment to halve rough sleeping by 2022 and eliminate it by 2027, alongside establishing the Homelessness Reduction Taskforce. The Taskforce will work to develop a cross-government strategy to achieve these commitments.

There is also investment to support the rollout of ‘Housing First’, with £28 million for the three Housing First pilots in Manchester, Liverpool and the West Midlands.

Housing First is a relatively recent innovation in international policy shift with regard to the treatment of the homeless and is an alternative to a system of emergency shelter/transitional housing progressions. Rather than moving homeless individuals through different “levels” of housing, whereby each level moves them closer to independent housing (for example: from the streets to a hostel, and from a hostel to a transitional housing programme, and from there to their own accommodation), Housing First moves the homeless individual or household immediately from the streets or hostels into their own accommodation. Housing First approaches are based on the concept that a homeless individual or household’s first and primary need is to obtain stable housing, and that other issues that may affect the household can and should be addressed once housing is obtained. In contrast, the more traditional model of "housing readiness" — that is where an individual or household must address other issues such as alcohol or substance misuse or job readiness that may have led to the episode of homelessness prior to entering housing on the basis that they will need to do this in order to be able to sustain a tenancy.

5.2 National Policy – Legislation and Guidance

In addition to the statutory requirements of the Housing Act 1996 as amended by the Homelessness Act 2002, the government from time to issues guidance, for example on allocations, and also information on how local housing authorities can address specific issues, such as rough sleeping. Also published are Regulations that set out in more detail the requirements of legislation.

The Localism Act 2011 was intended to allow local authorities more flexibility when managing or allocating accommodation. The provisions included the power for local authorities to discharge their full homelessness duty by providing suitable private rented accommodation for people who applied after November
2012, regardless of whether the homeless person agrees to the offer of the accommodation which if refused could then end the Council’s duty.

An important document for consideration when framing the housing allocation scheme is the *DCLG Allocation of accommodation: guidance for local housing authorities in England (June 2012)*. This makes clear that people who are homeless should be given reasonable preference – a head start on some other applicants - when determining housing priorities.

The government also published a *Vision to end rough sleeping: No Second Night Out nationwide (July 2011)* which sets out six commitments related to people who sleep rough which are focused on:

- Helping people off the streets
- Helping people to access healthcare
- Helping people into work
- Reducing bureaucratic burdens
- Increasing local control over investment in services
- Devolving responsibility for tackling homelessness.

The principle behind No Second Night Out is that a person’s or household’s housing crisis may mean they are homeless for one night, but that there should be a sufficiently wide ranging, flexible suite of services available from local authorities that ensure that they are not roofless for a second night.

The government published *'Making every contact count: a joint approach to preventing homelessness’ (2012)* which stated that:

> Effectively preventing homelessness goes beyond addressing immediate housing needs and requires a sustained commitment across all agencies to address the underlining causes of homelessness. These are often: unemployment, low skills levels, substance misuse, mental health issues, crime and dysfunctional family background.

The document highlighted the need to recognise that homelessness is often one symptom of a wider range of challenges applicants are facing and that such needs need to be met in a holistic fashion. This involves a considerable degree of cross departmental and inter-agency working and happens on a regular basis and it’s clear that this kind of working is likely to increase.

**Homeless Reduction Act 2017**

The *Homeless Reduction Act* has been described as one of the major pieces of homelessness legislation in the past 15 years by Shelter. Set out below is a summary of the main duties that the Council will need to respond to, particularly in relation to preventing homelessness for households and individuals at risk.

**Threatened with Homelessness**

Previously a person is defined as being threatened with homelessness if it is likely that they will become homeless within 28 days. The Homelessness Reduction Act 2017 increases the number of days from 28 to 56, including those
who have been served with a valid Section 21 notice. A section 21 notice is the legal notice that must be served by a landlord notifying the tenant that possession of the private sector property is required. A period in which to negotiate with a landlord once the s21 notice has been issued is vital to prevent homelessness and find alternative options, either through the same landlord or another, and is one of the ways in which our Housing Advice service has been successful in preventing homelessness.

Anyone accepted by the council as being threatened with homelessness will be owed the new prevention duty and we must take ‘reasonable steps’ to help them avoid becoming homeless. This could include placing them into temporary accommodation if the council considers that it is unreasonable for the applicant or family to continue to reside in their current accommodation.

Overall, the impact upon the council of this duty is that we would be expected to intervene in homelessness cases at an earlier stage and have a case open for longer. The council welcomed this amendment, giving us more time to prevent homelessness, including negotiating and securing alternatives before actual homelessness and thus obviating the need to provide temporary accommodation as an emergency measure. It will however increase the demands on our front line services due to the earlier intervention. Importantly this element of the duty is ‘priority need’ blind as well not requiring households to have a local connection which will mean our caseloads will increase substantially.

**Duty to provide Advisory Services (s179 HA 1996)**

The Housing Act 1996 stipulates that local authorities must ensure advice and information around homelessness and preventing homelessness is available free of charge to everyone in their district.

The new Act will require a more robust approach to advisory services with the need to provide information and advice on:

- Preventing homelessness
- Securing accommodation if homeless
- The rights of people who are homeless or threatened with homelessness, and
- Any other support (provided by the local authority or any other local organisations) that is available for people who are homeless and likely to become homeless and also how to access that help.

The council will need to ensure that advisory services are tailored to meet the needs of particular groups who are at increased risk of becoming homeless i.e. care leavers (who are now considered to have a local connection to an area if they were looked after, accommodated or fostered there for a continuous period of at least 2 years), prison leavers, armed forces, domestic abuse victims, hospital leavers and those suffering with a mental health illness.

This duty is welcomed and puts into statute the good practice in Tower Hamlets of working with partner agencies to develop pathways for cohorts of single
vulnerable people threatened with homelessness. Advice on housing options is already embedded in the No Wrong Door (NWD) model of this service to both families and single people. This is an innovative initiative to ensure homeless applicants can access all the services they need to help resolve their housing problems from one point of contact rather than having to navigate their way through lots of different agencies themselves. Staff are working closely with other agencies to provide this holistic and comprehensive range of services to help with problems that often cause homelessness or housing difficulties. This includes money advice, debt counselling, landlord and tenant mediation, specialist legal advice, help in accessing education and training, help in seeking work, access to child care and our Children's Centres.

**Duty to assess all eligible applicants & agree a personalised housing plan**

This measure will require the council to carry out an assessment in all cases where an eligible applicant is homeless, or at risk of becoming homeless. Following this assessment the council must work with the person who has applied for help, to agree the actions to be taken by both parties to ensure the person has and is able to retain suitable accommodation. These actions will also require the individual to engage and take a small number of key steps to ensure the interventions work. These steps will be tailored to their needs and be those most relevant to securing and keeping accommodation. These actions must be reasonable and achievable. This section applies to families as well as single applicants.

Currently, an assessment of a client's circumstances, what they want from the service and what they can expect is embedded in the No Wrong Door approach in Tower Hamlets and for single people this includes an assessment of whether they have support needs and if so, details of those needs. For those families with a priority need, where temporary accommodation is required, this includes details of education, employment, income and any support needs in order to determine what and where would they most reasonably be placed. In this respect an assessment would not be onerous and is good practice. The impact of the full assessment along with the completion of a personalised housing plan, will mean longer interview times as well as a change in style and culture of interviewing which is more geared up from a supportive angle as opposed to advising applicants of whether they qualify for housing under the current law.

**Duty to prevent homelessness**

Another key element of this provision is the duty to prevent homelessness. This duty can end by the applicant becoming homeless, ceasing to be eligible (relating to immigration status), securing suitable accommodation for at least 6 months or unreasonably refusing to co-operate having been advised that the council is minded to reach that decision. Prevention is a key element of the statutory duties which in Tower Hamlets is a fundamental element of the No Wrong Door approach and necessary to avoid the costs of temporary accommodation provision. This duty requires a decision in writing with a right of review.
Relief Duty

Under the Homelessness Reduction Act 2017, the council will have a duty to help all eligible homeless applicants to secure accommodation for a period of at least 6 months within 56 days, regardless of whether they are ‘intentionally homeless’ or in priority need. Those in priority need however, will be provided with interim accommodation whilst steps are taken to help secure future accommodation.

Tower Hamlets is a partner in the No Second Night Out (NSNO) initiative and provides temporary accommodation for those single people to avoid them sleeping on the streets and this will continue as part of our response to meeting our duties under the Homelessness Reduction Act. It is also highly likely that an assessment of their needs ensures a pathway either into supported hostel accommodation or into the private rented sector. Single people who approach the council for assistance who are not considered to be in priority need and who do not subsequently go on to sleep rough are not accommodated. Therefore, imposing this duty on local authorities for all single people which the council has reason to believe are homeless could dramatically increase cost and will limit the ability of the council to respond flexibly to demand.

Failure to Co-operate

This new provision within the Act will place a requirement on all applicants to co-operate with the council’s attempts to prevent or relieve their homelessness. If the Council considers that an applicant has deliberately or unreasonably refused to co-operate or take steps agreed as part of their assessment plan, a notice can be served to the individual informing them of the council’s decision, the consequences of it (e.g. ending of prevention / relief duty) and their right to request a review. This notice can only be served if a warning has been given to the applicant beforehand and a reasonable time period has elapsed since the warning was given.

Right to Review

The Homelessness Reduction Act 2017 gives applicants the right to request a review of any decision made by the council (in addition to those laid down in current legislation) regarding
- Steps set out in assessment plans
- Giving notice to withdraw prevention or relief duties
- Suitability of accommodation offered.

The workload with regard to statutory reviews could increase substantially given the additional opportunities for requesting a review. The proposals do not eliminate the right of appeal to the County Court against the review decisions and so the costs of defending additional review decisions could increase.

Public Authority Duty to Refer

Under the Homelessness Reduction Act 2017, “specified public authorities” e.g. NHS services, will be required to refer details of people who they consider being homeless or threatened with homelessness to any local authority (if the person agrees to the notification being made). The council will then need to make
contact with this individual for assessment and decide if it's a case which needs to be considered for full assessment and Personal Housing Plan. This duty is expected to commence in October 2018. The Council is negotiating with key partners on how this duty will be enforced.

**Partnership**

The Council works with partners including Bart's NHS Trust relating to vulnerable patients, including those with mental health illnesses and physical disabilities, in order to prevent them from sleeping on the streets. Housing Options officers attend and sit on a number of boards, including the level 3 Multi Agency Public Protection which is for very high risk and urgent cases, and the hospital panel meetings. Partnerships and co-operation are a key part of how the Council works around homelessness and housing vulnerable people.

The Council’s Housing Options team takes a proactive approach to homelessness, meeting its statutory duties towards homeless households whilst offering support to those who are at risk of becoming homeless. The Council’s involvement in the ‘no first night out’ and ‘no second night out’ initiatives has proved successful, and work is carried out with partners across multiple London Boroughs.

### 6.0 Regional Context

#### 6.1 Overview of London Housing Strategy and its approach to Homelessness

The Mayor of London’s draft London Housing Strategy was published in May 2018. It states that one in 50 Londoners are now homeless, with the true figure which takes into account the hidden homeless believed to be much higher. That means some 175,000 Londoners are homeless. The Strategy lists the increasingly growing number of unaffordable homes as the main reason why people experience homelessness. The strategy accepts that councils – including Tower Hamlets – are struggling to house homeless people, particularly families. Across London the number of people sleeping rough on the streets of London has more than doubled between 2009/10 and 2016/17. Tower Hamlets and other London Boroughs are finding that increasing numbers of rough sleepers are non-UK nationals.

The London Housing Strategy offers a range of proposals to prevent and address homelessness, set out in Policy 7.1: Preventing and tackling homelessness:

**A:** The Mayor will work with councils, Government, and charities to support a greater focus on prevention of homelessness. This will include:

- supporting the Homelessness Reduction Act and pressing Government to provide adequate funding for councils to deliver their new duties
- tackling the root causes of homelessness by investing in affordable homes, and lobbying Government to reform private renting and review its welfare changes; and
- acting to prevent youth homelessness by investing in accommodation and lobbying Government to review the impact of its welfare reforms.
B: The Mayor will work with councils and Government to ensure those who lose their accommodation are supported into sustainable accommodation. This will include:

- investing in accommodation for homeless Londoners and working with councils to coordinate procurement of accommodation
- expecting councils to meet their obligations to inform other councils when they place homeless households in their areas, and to have in place clear policies around the provision of accommodation for homeless households
- working with councils to build a case for a fairer funding regime for accommodation for homeless households
- providing a package of interventions to address homelessness caused by violence against women and girls; and
- helping to ensure that homeless veterans receive the support they are entitled to and deserve, as outlined in the national Code of Guidance.

In addition Policy 7.2: Supporting Rough Sleepers off the streets sets out the following proposals:

A: The Mayor will bring together Londoners and key partners involved in supporting rough sleepers off the streets to provide pan-London leadership and coordination, to identify and pursue new approaches to tackling rough sleeping in London, and to make the case for greater resources within national efforts to reduce rough sleeping. This will include:

- establishing and leading the No Nights Sleeping Rough taskforce to bring together key partners involved in supporting rough sleepers off the streets, and making funding available to support its work
- participating in the Government’s new Rough Sleeping Advisory Panel, using this opportunity to make the case for greater resources to help tackle rough sleeping in London and for Government to address its root causes
- promoting and publicising opportunities for Londoners to make a real difference to some of the most vulnerable individuals in the city; and
- working with partners to produce a plan of action that outlines comprehensively what more he and they will do to tackle rough sleeping with existing resources, as well as where additional support and action from Government is needed.

B: The Mayor will fund and commission a range of pan-London services and other initiatives to complement those provided by local councils. These will focus on identifying rough sleepers and intervening rapidly to support them off the streets, providing specialist support for particular groups, and helping rough sleepers stay off the street. This will include:

- allocating around £8.5 million each year to fund pan-London rough sleeping services that work in tandem with the services boroughs commission
• using additional and future funding to develop new services including a
permanent base for the No Second Night Out service, a Social Impact
Bond to support the most entrenched rough sleepers, services to support
vulnerable non-UK nationals, an outreach service to operate on night
buses and the Night Tube, and a pilot service to help rough sleepers with
mental health needs; and

• making available up to £1 million to promote innovative new services
through a Rough Sleeping Innovation Fund.

C: The Mayor will work with councils and others to improve the provision of
accommodation for rough sleepers. This will include:

• developing a Hostel Clearing House that helps councils and the services
they commission make optimum use of London’s hostel spaces for rough
sleepers
• making up to £30 million funding available to support the provision of
hostel accommodation for single people, including rough sleepers; and
• earmarking up to £50 million funding to provide accommodation for people
leaving hostels or refuges, and urging Government to provide revenue
support for this type of accommodation.

Source: London Housing Strategy May 2018, GLA:
https://www.london.gov.uk/what-we-do/housing-and-land/tackling-londons-
housing-crisis

The Mayor of London launched a separate London wide Rough Sleeping Action
Plan in June 2018;

https://www.london.gov.uk/what-we-do/housing-and-land/homelessness/rough-
sleeping-plan-action

6.2 East London Housing Partnership – Delivery Board

The Council works closely with its seven Local Authority partners which form the
East London Housing Partnership. The ELHP employs a small team to work
across the sub-region to ensure a collaborative approach to tackling
homelessness which is overseen by a delivery board made up of senior officers
with a responsibility for homelessness.

ELHP Initiatives include:

East London Womens Project

ELHP secured funding from the Department for Communities and Local
Government to assist survivors of domestic abuse and other forms of gender
based violence. The project provides supported accommodation for female
survivors of abuse who have multiple disadvantage such as substance use,
mental health issues, history of offending, sex working, no recourse to public
funds or other multiple or complex support needs.
New Leaf

New Leaf aims to deliver upstream homelessness prevention advice and support to 1,000 private rented sector (PRS) households who are threatened with homelessness up until October 2020.

The objectives of the New Leaf project are to:

- Improve access to personalised advice and support for PRS tenants, leading to improved housing outcomes
- Maintain and increase the number of homeless preventions by 18% (700 cases) across ELHP boroughs through the provision of timely assistance, enabling people to remain in their homes wherever possible
- Build an evidence base to improve understanding of and responses to the increase in AST terminations, and to help LAs target clients at greatest risk of homelessness
- Improve life-skills and knowledge for clients, leading to better opportunities to engage in work and volunteering.

New Leaf will assist a minimum of 1,000 clients during its lifetime. It will be open to all eligible households (regardless of priority need), but referrals will only be accepted at up to tenancy notice stage to avoid overlap with existing local authority provision. Low-needs floating support will be delivered and the project will coordinate tenancy training modules for tenants.

New Routes

New Routes will deliver rent deposits for 250 non-priority single households (or couples) when homelessness prevention has failed.

The objectives of the New Routes project are to:

- Prevent homelessness where possible
- Prioritise applicants where rough sleeping is imminent
- Provide access to rent deposit and assist with accommodation procurement
- Link to the proposed ELHP New Leaf model to prevent repeat homelessness, provide tenancy training and ongoing support.

Accommodation will be largely shared accommodation, including outside of London (subject to appropriate needs assessment). ELHP is working with Credit Unions to make small loans available to applicants to top-up the rent deposit grant, subject to appropriate affordability checks.
7.0 Homelessness in LB Tower Hamlets

7.1 Headline Statistics

- There are over 2,000 households in temporary accommodation of which over 1,000 are housed outside the borough

- In 2017/18 the Housing Options Team made homeless decisions, this is 15% down on decisions made in 2014/15. Of the 656 homeless decisions made, 522 were accepted as homeless

- In 2017/18, 78 households were intentionally homeless and in priority need, for the same period, 522 households were unintentionally homeless and in priority need – this is a reduction of 27% compared to 2008/09

- During 2014/15 the Housing Options Team prevented over 672 households becoming homeless

- Recorded rough sleeping has increased from 4 in 2013; 6 in 2014; and 12 in 2015.

7.2 Welfare Reform and its Impacts on Homelessness

Austerity, rising costs of housing and the rising cost of living are taking their toll on Tower Hamlets and those on low and middle incomes. The changes to the benefits system, Universal Credit and the Benefit Cap have left many families in Tower Hamlets worse off. Job losses and unemployment have a direct impact on housing and homelessness, as such since 2010, there has been an increase in the number of people homeless in Tower Hamlets.

The Council’s Housing Strategy 2016-21 highlighted the impact of welfare reform changes on housing, including highlighting the ease at which households may fall into rent arrears. The Council is committed to ensuring that up to date housing advice and data is given to residents impacted by the roll out of welfare reform.

Tower Hamlets is one of the poorest local authorities in the UK, with 44% of households in income poverty, over 50% of children grow up in poverty, and there are 16,379 people unemployed. The rising cost of living is having a significant impact on housing and homelessness.

Rents in the private rental sector are rising year on year, and as there are fewer social housing available, residents have nowhere to turn which is why people end up homeless.

The Council is currently reviewing its use of Discretionary Housing Fund and

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7 Unemployment and ethnicity, 2011 Census Factsheet, LBTH, June 2015
8 2016-21 Tower Hamlets Housing Strategy
Implications for Homelessness prevention.

7.3 LBTH Homelessness Strategy 2013 – 18 - Review

The last homelessness strategy highlighted the importance of the council working with partners, along with focussing on homelessness prevention. Despite the worsening national, regional and local rise in homelessness the Council made significant progress in preventing homelessness and assisting the most vulnerable households in the borough:

- Achieving a 100% reduction in bed and breakfast for families so that no family is placed in bed & breakfast for longer than the statutory limit of 6 weeks
- Successful implementation of the No 1st night and No 2nd night initiatives
- Successful implementation of the Routes to Roots project that has enabled a significant number of homeless individuals to return to their place of origin in the United Kingdom
- Successful procurement of Temporary accommodation within 90 minutes travel to the borough enabling households to maintain ties with their communities whilst displaced
- Successful rehousing 1,366 homeless households (bands 1B and 2A) into permanent accommodation under the last homelessness strategy
- Successful restructure of Housing Options Team to prepare for the Homeless Reduction Act.
- LB Tower Hamlets continuing to be a key regional and sub – regional influential and respected partner.

7.4 Overview and Scrutiny Panel - 2016

The Council’s commitment to tackling homelessness is further demonstrated by the decision to convene an Overview and Scrutiny Panel in 2016. Key recommendations included:

- The Mayor and Lead Member should undertake a rolling programme of unannounced visits to all the B&Bs and hostels used as both emergency accommodation for homeless families and single people
- The Mayor should not authorise officers to discharge the Council’s main homelessness duty through a Private Rented Sector offer
- Develop and publicise a plan to meet the demands on temporary accommodation
• Ensure the future strategy on homelessness adopts an approach to limiting the use of bed & breakfast for families

• A summary of all those cases in which a family with children or vulnerable single person has been deemed intentionally homeless should be reported monthly to the Mayor and Lead Member

• Implement a package of support for families placed out of borough in order to help households settle into a new borough.

7.5 Overview and Scrutiny – Effectiveness of health and social care provision for homeless residents - 2018

In March 2018, The Tower Hamlets Health Scrutiny Sub-Committee published the results of its scrutiny into the effectiveness of health and social care provision for homeless residents as the subject for a Scrutiny Review. They recognised that Homelessness is a complex and growing problem which reaches right across the health, public health and social care agendas. The Sub-Committee made a total of 14 recommendations to improve the health outcomes for homeless people. The report is set out at Appendix 4. The recommendations can be summarised as follows:

Training

That the CCG provides training to staff in GP surgeries and for other health professionals to support them to deal with some of the behaviours which may be encountered when engaging with homeless people. In addition, that the LBTH Adult Social Care and the CCG explore the possibility of providing all frontline workers and auxiliary staff (i.e. staff in ideas stores, parks service) with training and awareness raising sessions to help them identify homelessness.

Commissioning

That the council explores the possibility of commissioning specialist provision to accommodate individuals with challenging behaviour, review how palliative care is provided to people living in hostels and temporary accommodation and the possibility of commissioning a peripatetic team consisting of a paramedic and advanced care practitioner in mental health to provide a visiting service to very difficult to manage and violent patients.

Service Improvement

That a person’s housing issues are identified and addressed as part of the social prescribing programme in the borough. That Bart’s Health Trust reviews its discharge planning process to ensure that staff routinely ask all patients on admission if they have somewhere safe to be discharged to and identify referrals requiring further assistance.
That the council and the CCG review the way services share information and consider if the introduction of GDPR and the review of systems that follows will allow for more information to be shared between services to support the way homeless residents access and engage with services.

That the Housing Options service works with organisations involved in this Review, and with individuals who present at Housing Options, to find out what they consider to be a safe offer of temporary accommodation and provide insight into what they value and how they would feel better supported upon approach.

**Domestic Violence and Violence Against Women and Girls**

That the council performs further research on the impact homelessness has on the health needs of women who are rough sleeping, in Temporary Accommodation, or hostels and into the relationship between homelessness and Violence Against Women and Girls with a view to updating the VAWG strategy to include a stronger consideration of violence against homeless women.

**Partnership Working**

LBTH Adult Social Care explores the possibility of establishing a partnership forum (including commissioners, providers, third sector) to discuss the health and social care issues, provision, and cases of homeless residents in LBTH. That Healthwatch Tower Hamlets reach out to the organisations involved in this Review and establish a link to share the information they collect on homeless people’s experiences of using health and social care services in the borough.

That Healthwatch Tower Hamlets work with Groundswell to disseminate ‘My Right to Healthcare’ cards across the borough and ensure they are available in all GP surgeries.

### 8.0 How the 2018 – 2023 Homelessness Strategy is set out

The Homelessness Strategy has two main themes; **Prevention** and **Response** of services, with four sub-themes.

**Theme 1 – Prevention of Homelessness:**

1. Preventing homelessness through advice and compliance with the Homelessness Reduction Act

2. Preventing homelessness by access to Affordable Housing Options.

**Theme 2 – Response of Services to homeless households and vulnerable people:**

3. Tackling Rough Sleeping
4. Supporting Children, Families and Young People and Vulnerable Adults.

8.1 Prevention - Theme 1: Homeless Prevention and Tackling the Causes of Homelessness and implementing the Homeless Reduction Act

Objectives:

Provide quality, timely and accessible information and advice focused on homeless prevention and support by:

- Ensuring that there is clear and consistent information at all key contact points for homeless households and those at risk of being homeless

- Improving the quality and accessibility of housing and homelessness advice services and pathways

- Working with East London Housing Partnership on the New Leaf and new Routes projects

- Meeting our duties under the Homelessness Reduction Act.

Support people to remain in their homes by:

- Working proactively with social and private landlords to identify and support people at risk of losing their homes and assist tenants to maintain their tenancies

- Providing advice and support for people at risk of losing their homes

- Providing financial inclusion and income maximization advice and support for residents, particularly those at risk of losing their homes

- Mitigating where possible the impact of welfare reform on homeless and formerly homeless people.

Address the root causes of homelessness as part of a partnership approach to tackling worklessness and exclusion by:

- Providing employment support and pathways to employment for households at risk of homelessness and exclusion

- Strengthening strategic commitment and joint working on homelessness prevention and exclusion

- Making better use of information and intelligence across the partnership to tackle homelessness and exclusion
How we will deliver this priority:

Our overall approach to deliver this priority will be guided by the work to date which has been progressed to ensure effective implementation of the Homelessness Reduction Act. This work has been ongoing since 2016 and has involved a significant restructure of the Housing Options Service.

Service re-design to meet the challenges of the Act

In 2017 the Government announced New Burdens Funding for the Homelessness Reduction Act implementation, and consequentially frontline services were re-designed with additional staff resources. The allocation of the funding was announced on 16 October 2017 by Ministry of Housing Communities and Local Government (MHCLG). Tower Hamlets has been allocated a total of £1,554,181 for the three year period 2017/18 to 2019/20.

In order to meet the new duties there additional officer time will be factored in for completion of full homeless assessments and client Personal Housing Plans. In addition, frontline services will also consist of a ‘Gateway Service’ which will entail an initial assessment by officers who will ensure that customers are filtered and signposted to the services within Housing Options which will be able to best support their needs: e.g. vulnerable clients referred to Complex Host service, Assured Shorthold Tenancy eviction case to be referred to Housing Advice services.

Staff Recruitment

It is anticipated that there will be an initial increase in staffing costs due to increased caseloads and a high level of early intervention. The Government expects overall costs to Local Authorities to be reduced over the first three years as the implementation of the Act will lead to a reduction of s193 acceptances. This section of the 1996 Housing Act applies where the council are satisfied that an applicant is homeless, eligible for assistance and has a priority need, and are not satisfied that the applicant became homeless intentionally.

The Council has recruited an additional 13 officers to manage the increase in workload and mitigate the impact of HRA. Most of the positions will be on fixed-term contract to allow the Council to review its position following HRA implementation.

Upskilling our staff

Training on the implementation of the Act commenced from October 2017 onwards provided by Shelter and National Homelessness Advice Service. Further training has been identified through the London Training Academy, funded via MHCLG and being delivered via Southwark as it’s a HRA trailblazer. Training caters for different skill levels of staff and includes elements of psychologically informed environments to support motivational interviewing and reflective practice.
Updating website and leaflets

The Council’s website will be updated as well as leaflets to inform residents of the Act and improve advice and information to ensure that they are correctly signposted and receive the best possible service from the Council.

Briefing partner organisations

A programme of briefing sessions to inform partner organisations and the voluntary sector has been undertaken. Updates are being provided in all scheduled meetings for supported housing providers.

Meeting the anticipated increase in supply of temporary accommodation

A range of options are currently being developed and implemented to increase the supply of temporary accommodation to address homelessness and include: procurement of private sector accommodation, Right to Buy buy-backs and provision of modular housing. This activity is set out in more detail in the next section.

Increased request for reviews

It is anticipated that there will be an increase in the number of reviews and challenges as result of Act. Specifically on reviews, two additional review officers have been appointed. Officers will ensure decisions are thorough and compliant with the law and Homelessness Code of Guidance to minimise further challenges. It is also anticipated that the work undertaken by front line staff in developing Personal Housing Plans with clients will reduce the number of challenges.

Exploring and enhancing a range of preventative measures

In addition to existing provisions in place to prevent homelessness e.g. Sanctuary Scheme, rent deposits, the service is exploring and doing more work to increase the prevention and options toolkit for those facing homelessness.

Greater reliance will be needed on Private Rented Sector housing solutions, working effectively in partnership with mediation services and developing and adopting a range of incentives and measures to prevent homelessness to enable, where possible, applicants to remain in their existing homes e.g. in exceptional circumstances paying off rent arrears, if the tenancy is affordable and sustainable for a minimum of 6 months.

Where appropriate we will enhance existing initiatives;

No Wrong Door approach,

The Council’s Housing Options service introduced its innovative programme – called No Wrong Door to ensure that customers can access all the services they need to help resolve their housing problems from one point of contact rather than having to navigate their way through lots of different agencies themselves.
The Council’s Housing Options service has been transformed to offer more help to those threatened with homelessness or needing housing advice. Instead of being able to simply offer advice on housing options, staff are working closely with other agencies so as to be able to offer information on a comprehensive range of services that help with problems that often cause homelessness or housing difficulties. This includes money advice, debt counselling, landlord and tenant mediation, specialist legal advice, help in accessing education and training, help in seeking work, access to child care and our Children's Centres.

Staff can make referrals to other agencies to ensure clients get the help they need, and some support services are now operating from Albert Jacob House in Bethnal Green E2 where Housing Options staff are based.

**The role of Housing Options (homelessness) Service play in delivering services to rough sleepers?**

As set out above, LBTH’s Housing Options Service (HOST) has been implementing the Homelessness Reduction Act which includes:

- Homelessness prevention. e.g. mediation, eviction prevention
- Homelessness relief e.g. referrals into B&B, hostels and PRS.

HOST has a Pathway manager who coordinators all the hostel referrals, sideways moves and moves out of supported accommodation. This is a pivotal role in preventing evictions.

In addition to the Lead Professionals team which is the first port of call for clients seeking Homelessness Prevention options, HOST also employ a Complex Needs Team to work more intensively with high support self-referred and partner agency clients (MAPPA, IOM, Hospital Pathways) who require a homelessness relief duty and longer term support.

The HOST manager sits on the Steering Group of the tri-borough (Tower Hamlets, Hackney and City of London), No First Night Out homelessness prevention project that has been running since April 2016. The interventions and lessons of this project are being embedded within the Housing Options Service.

**New Information Technology system**

In order to implement the Act and comply with the new reporting requirements the Council has procured new technology that will ensure effective monitoring and data recording of HRA cases and enable the Council to report via H-CLIC which is gathering case specific data for MHCLG. Delivery of training and change management to all frontline services is currently underway.

**8.2 Prevention - Theme 2: Access to Affordable Housing Options**

The Council believes that the provision of suitable housing for people that is decent, warm and weathertight is a fundamental right. Increasing the supply of housing will fundamentally assist in our desire to tackle homelessness.
Tower Hamlets is at the forefront, regularly delivering the highest amount of affordable housing nationally for what is one of the geographically smallest boroughs in the country. Twinned with this is meeting the parallel challenges of delivering economic growth and regeneration that benefits local people.

For ongoing investment to be successful and sustainable, the benefits need to go beyond the bricks and mortar of housing, essential though the housing is. A new facet to the challenge is sustaining delivery in what is a difficult environment with limited public funding available for new affordable rented housing. The prospects for the residential housing market currently look uncertain and we need to be flexible about how we approach the housing delivery work that we have been successful in achieving in the past.

Population growth, meeting housing need locally and the requirement to contribute to meeting housing demand across London all point to the continued development of thousands of new homes in the Borough over the next ten years.

Our current Housing Strategy sets out in detail the number of homes, the broad location, and the type and cost of affordable accommodation in the borough which we aim to develop. We also set out how we want to see economic growth and regeneration calibrated to help meet residents’ broader aspirations. Much of the economic growth and regeneration in the borough is housing-led, so we need to ensure that this kind of investment gives us more than new affordable housing, important though this is.

In summary we aim to achieve the following objectives

Increase the supply of housing across all tenures by:

- **Working in partnership with housing providers and developers, to continue to provide new affordable homes**

The GLA has set the Council and an annual target of delivering just under 4000 new homes per year. This target is on line with the Council’s own target as identified through its most recent Strategic Housing Market assessment.

The Council’s Local Plan stipulates that between 35% and 50% of these homes should be affordable at either social rent, Tower Hamlets Living Rent, London Living Rent or for intermediate Housing. The Council will work with its Registered Provider and developer partners to ensure this target is upheld. More detail on how the council ensures a further supply of new affordable homes is set out in the 2016 – 2021 Housing Strategy.

- **Identifying potential funding opportunities to develop new council homes**

The Mayor has committed the Council to reach a target of 1000 new Council homes between 2018 and 2022. Plans for nearly 500 new homes on existing Council land are already in place and a list of other potential sites will be identified and assessed for their suitability for the additional homes promised.
• **Working through the Council’s Housing Companies to secure further housing, both through purchase of existing market properties and developing new homes**

In line with many other Local Authorities, the Council has set up new housing delivery vehicles which will enable to increase housing supply through alternative housing financial models. These companies, Mulberry Homes and Seahorse Homes will become operational in the near future and be able to make use of other financial power in order to procure permanent and temporary accommodation both inside and outside of the borough and provide an additional supply of housing, much of which will be used to enable the Council to meet its homelessness duties.

• **Bringing empty properties back into use**

The council has a proactive approach to working with the owners of empty properties to bring them back into use. This includes advice and assistance, access to grants in return for council placements of homeless families and use of enforcement and planning powers where necessary.

**Develop innovative and sustainable housing options in the private sector by:**

• Improving the accessibility of the private rented sector as a continued opportunity to prevent homelessness, recognising that caps on Housing Benefit allowances influence affordability considerations

• Ensuring that the private sector offers safe and good quality housing options

• Promoting private tenants’ rights and supporting responsible landlords through the ongoing promotion of the Council’s Private Renters Charter.

A key part of the 2016-21 Housing Strategy was a commitment and action plan to improve the conditions of those renting privately in the borough. In addition to making use of licensing powers the Council has also produced a Private Renters Charter which sets out the rights of renters and how they can seek redress when landlords are in breach of their legal duties. The Charter was produced in conjunction with the borough’s leading advice agencies.

**Maximise the use of the existing social housing stock by**

Homeless applicants with children and where the Council has accepted a statutory duty following investigation and an assessment are classified as being in priority need and placed in Priority band 2 A giving them the same priority as homeless households.

• Using general needs social housing as temporary accommodation where appropriate.

In recent years the Council has worked with its partners to use some of its permanent housing stock for temporary accommodation in order to both reduce...
costs and provide households who most need to stay in the borough with a suitable temporary offer.

**Ensure that there is a sufficient supply of appropriate temporary accommodation and reduce the time spent in temporary accommodation by:**

- Developing a sustainable approach to procuring temporary accommodation.

**Standard approach**

The Council has a dedicated team which procures temporary accommodation both inside and outside the borough and supports all households who are placed in this accommodation. Emergency bed and breakfast and nightly paid accommodation is used when necessary but no families have been placed in bed and breakfast for longer than 6 weeks since 2015.

In addition the Council works with a range of private sector landlords across London and the south east in order to provide temporary accommodation. Details of where the location of these placements and a raft of other information on homelessness are published on the Council’s website here:

https://www.towerhamlets.gov.uk/lgnl/housing/housing_options_service/housing_and_homelessness_publi.aspx

**Innovation**

The Council has led a working group of boroughs from across London, proposing a collaborative approach to acquiring modular temporary accommodation, manufactured in a factory, installed on “meanwhile” sites and moved to other sites as they become available, with the homes let by boroughs to homeless families as a cheaper and better quality alternative to Bed & Breakfast or other nightly paid temporary accommodation.

The GLA have grant funded £11m for this scheme from their Innovation Fund. London Councils are supporting the programme from the Capital Ambition programme.

The Council launched an ambitious £75m programme through a not-for-profit company PLACE (Pan-London Accommodation Collaborative Enterprise), which aims to procure “precision-manufactured” family homes that have the quality of permanent housing but can be moved from one site to another.

The accommodation will be placed on vacant sites that would otherwise remain underused over the short to medium term, and will deliver a mixture of two and three-bedroom family properties, which boroughs have identified as the property type most needed for homeless households. The company will own the units, leading to a more cost-effective option for boroughs than they would get from leasing units directly from a supplier.
PLACE was launched at an event on Wednesday 25 July in the Tower Hamlets Council Chambers. The deadline for submissions of the Expression of Interest Selection Questionnaire is 15th August 2018.

8.3 Provision of Services - Theme 3 Supporting Rough Sleepers

Overview and challenges

We know that rough sleeping is harmful and dangerous for the individual. Recent studies indicate that the average life expectancy for a rough sleeper is 47 years. We also know that rough sleeping negatively impacts on the local community in various ways.

LB Tower Hamlets is therefore fully committed to ending rough sleeping by preventing people sleeping rough for the first time and reducing the number of individuals currently sleeping on the streets.

The council will work in line with the MHCLG’s aim (which will be detailed in the National Rough Sleeping Strategy due for publication in the summer of 2018) to halve rough sleeping over the course of the Parliament (by 2022) and eliminate it altogether by 2027.

The council will also be working in line with the GLA’s objective to ensure there is a route off the streets for every single rough sleeper in London so that they are supported through to safe and secure accommodation as quickly and sustainably as possible as stated in the London Housing Strategy 2017.

The challenges the council faces are not unique to Tower Hamlets but are common to many London boroughs. The main challenges are:

- **Increasing numbers of rough sleepers** - The number of people found rough sleeping has risen year on year across the whole of London including Tower Hamlets. In 2012/13, 331 individuals were found sleeping rough by outreach teams in Tower Hamlets compared with 475 in 2017/18. The borough’s vibrant night time economy attracts people from other parts of London and the wider country including rough sleepers. Our population of rough sleepers is made up of individuals who have a local connection to the borough and also those from other parts of London, the country, the European Union and the rest of the world. Each of these individuals are unique with their own history of how they came to sleep rough and what resources and housing options are open to them in Tower Hamlets and in the UK.

- **Complex needs** - Rough sleepers with a Tower Hamlets’ local connection often have very complex needs (e.g. people with a triple diagnosis and/or a serious forensic history, couples and people with pets) and therefore need very sophisticated and personalised accommodation and support options. A major concern for our rough sleeping population is the level of substance
misuse resulting in and being a response to both their physical and mental health needs.

- **Entrenched rough sleepers** - Those who are very entrenched in a street lifestyle can often be resistant to taking up offers of support (including health and substance abuse support) and accommodation options. These individuals can also contribute to notable levels of anti-social behaviour that negatively impacts on the community.

- **Limited accommodation options** - There is an increasing need to place individuals in accommodation options in other boroughs due to all options within Tower Hamlets having been exhausted. Some clients with a local connection to Tower Hamlets are unwilling to access accommodation in other areas while others face the reality of the lack of specialist provision for couples and people with dogs.

- **Returning to rough sleeping** - There are a number of people who return to rough sleeping in the borough after a period of time in either temporary or long-term accommodation.

**Responses**

The council is responding to these challenges by committing to provide services and interventions that aim to:

- Prevent people from having to rough sleep for the first time in the borough
- Support new rough sleepers so they don’t spend a second night on the streets
- Assist people to exit the street safely and to sustain accommodation so that no one calls the street their home
- Help former rough sleepers maintain their independence and accommodation.

Our responses fall under three headings:

1. Providing services and interventions in partnership
2. Participating in forums and implementing models to support rough sleepers and reduce the anti-social behaviour associated with some rough sleepers and sleeping sites
3. Producing and updating a Rough Sleeping Action Plan

**Providing services and interventions in partnership**

These service and interventions will be delivered in partnership with a range of council departments, other statutory services, third sector organisations, faith based organisations, the GLA, East London Delivery Board, MH CLG and the wider community.

**Rough Sleeping Street Outreach Service**
The council will continue to commission a rough sleeping outreach service to identify, assess and support individuals to exit rough sleeping and to retain their accommodation.

The council commissions St Mungo’s Tower Hamlets Street Outreach Response Team (TH SORT) to work with rough sleepers with a range of needs; the majority have medium, high or complex needs. TH SORT is an example of good practice and a service which is an exemplar of strong multi partnership working to deliver the best outcomes for homeless residents. The service performs both outreach to the streets and in-reach into hostels and aims to identify and engage people who are sleeping rough and find the best pathway for them into accommodation and to sustain their housing. Assessments are carried out by the team to identify local connection, needs and risk assessments. It has joint working protocols in place with a number of agencies and services throughout the borough, including Health E1, the Hospital Pathways Team, each of our hostel providers and Drug and Alcohol RESET service.

Significantly, the team has a number of specialist workers highly skilled in supporting vulnerable women, long term entrenched rough sleepers, our local Bangladeshi community and non-UK nationals. TH SORT provides InReach support to hostel residents who are at risk of losing their tenancies and returning to rough sleeping. This can be a vital additional support to our hostel residents and staff. It also has embedded within the team an Approved Mental Health Professional (AMHP) who is seconded from the East London Foundation Trust. The AMHP is able to take time to develop relationships with complex rough sleepers who have poor mental health and identify the right pathway into mainstream mental health services. TH SORT conduct street shifts seven days a week in the early mornings and late evenings. They are the first outreach team in London to develop a First Response service - a team of volunteers who work alongside salaried workers to identify new rough sleepers.

With new funding from the MH CLG's Rough Sleeping Initiative Winter Programme coming on stream in the autumn 2018, TH SORT will fill the gaps in their current street outreach model with a street nurse and specialist immigration advisor.

**Day services for rough sleepers and those who are vulnerably housed**

The council will continue to commission a day service for rough sleepers and those who are at risk of homelessness through a No First Night Out prevention approach. Providence Row Charity’s Resource Centre currently provides this service which incorporates engagement services that meet the basic needs of rough sleepers (meals, showers and mailing address), housing and needs assessments, joint support plans with the Tower Hamlets outreach services, referrals to a range of low and medium threshold well-being and drug and alcohol recovery services, employment and training opportunities, referrals to specialist health and immigration agencies and voluntary safe reconnections. They also deliver the Roots to Routes Royal London Hospital Discharge service for NFA clients with a local connection outside of Tower Hamlets. In October 2018, the
service will be a dedicated referral agency to the council’s Housing Options service under the new HRA legislation.

With new funding from the MH CLG’s Rough Sleeping Initiative Winter Programme coming on stream in the autumn 2018, Providence Row will become part of the council’s Severe Weather Emergency Provision Programme. It will also provide a trauma informed psychotherapeutic outreach/InReach service to work closely with TH SORT’s outreach and InReach clients.

**LBTH Drug and Alcohol Action Team (DAAT)**

The DAAT delivers the partnership 2016-19 Substance Misuse Partnership Strategy. The strategy aims to reduce the harm caused by drug and alcohol misuse, commission high quality treatment, improve the health and well-being of individuals who misuse substances and reduce the crime and antisocial behaviour associated with substance misuse.

Nearly two thirds of rough sleepers in the borough had drug and/or alcohol needs in 2016/17\(^9\). Of all the people starting drug and alcohol treatment (around 2000 per year), 11% had an acute housing risk or problem, meaning they were homeless in the 28 days prior to treatment. After they completed their treatment this reduced to 3%. Furthermore, 8% of new entrants had an acute eviction risk within the 28 days prior to treatment, which reduced to 1% by the time they exited treatment.

To help prevent substance misuse issues from emerging and encourage behaviour change the DAAT is integrated with Housing Options and share governance processes and key performance targets, and they present at each other’s forums. The DAAT is also linked into the Pathways Homeless Service at the Royal London Hospital, Dallow Day Centre and TH SORT. They have dedicated substance misuse outreach teams on the street and in hostels to identify issues and people on the street early and motivate them to engage in treatment.

The DAAT has a High Impact Drinkers Programme which takes a multi-agency approach to engaging alcohol misusing individuals. This targets a cohort in the borough who are dependent drinkers and are not willing to access support services even after they have been engaged and referred to treatment. This cohort places a high demand on accommodation services, the Police, the Ambulance Service, the Fire Brigade and social care. The programme has trained over 100 frontline professionals and focuses on risk management, engagement and encouraging behavioural change through motivating vulnerable individuals to get help.

The DAAT commissioned RESET, an integrated drug and alcohol treatment service, in 2016. This service has been designed to make it easier for people to

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\(^9\) St Mungo’s CHAIN data, 2016/17
access treatment. RESET has three key strands; outreach and referral, mainstream treatment, and a separate recovery support service which focuses on long term interventions to help people to move on from evictions. The service provides treatment interventions and supports people with broader health care issues. It also supports service users at risk of homelessness, supports homeless service users with GP registration, provides a suite of activities to provide structure to the lives of service users and offers advice and support on financial welfare. RESET have developed very robust pathways with the Royal London Hospital, LBTH hostels, TH SORT, Health E1, criminal justice pathways, prostitution forum and social care pathways.

The DAAT also commission a dedicated service at Health E1 to support homeless service users misusing substances. Furthermore they commission a Primary Care Drug and Alcohol service which is focused on broader health checks to ensure people accessing substance misuse services, including many of the homeless population, have good access to physical and mental health care through mainstream general practice.

**Accommodation options**

The council is committed to providing a range of housing options to meet the diversity and complexity of needs in our rough sleeping population.

**Hostel services in the borough**

The main housing option for rough sleepers in Tower Hamlets is within the supported housing or more commonly known as the single adult’s generic hostel sector.

Following a reconfiguration and reduction in the hostel in 2017/18, there are currently 448 commissioned bed spaces across seven hostels. All but one accept clients with medium to high support needs only, while some specialise in working with particular cohorts, e.g. women only, entrenched long term drinkers, stabilised drinkers and the ageing homeless.

As the needs of our rough sleepers change, we are committed to working closely with our hostel providers to ensure their referral criteria and service models meet these needs. For example, ensuring there is enough emergency and move on accommodation for rough sleepers with pets; ensuring hostels can offer a personalised support package and holistic trauma-informed, PIE environment to our most complex clients.

The council is also committed to learning how to more effectively support co-dependent couples who are rough sleeping. We supported St Mungo’s bid to the GLA’s Innovation Fund that aims to identify effective interventions and housing options for co-dependent couples.

In addition to rough sleepers entering hostel accommodation through their assessment units or full admissions, rapid access emergency bed spaces and ‘safe seats’ exist and are ring fenced for rough sleepers who are brought in off
the street by TH SORT. The council commits to continue to provide emergency supported accommodation to meet our aim of No Second Night Out and ensuring vulnerable individuals can be rapidly brought into a place of safety 24/7.

Our commissioned hostel sector is also the main provider of the council’s Severe Weather Emergency Provision. To save life and limb, the council is committed to continuing to provide local emergency accommodation when the temperature falls to 0°C or below for one night or more. In 2017/18, we expanded this provision to include a severe weather emergency day time provision for when the day time temperatures are expected to fall to 0°C or below for a prolonged period. Going forward, the council is considering measures to reduce the risk of harm to rough sleepers from extreme heat.

**Pan-London accommodation options**

The GLA fund a number of pan-London projects and services for rough sleepers. The council is committed to working in partnership with the GLA to support and utilise these services including: the No Second Night Out Hubs, Routes Home service for non-UK nationals, pan-London Severe Weather Emergency Provision for out of borough clients, pan-London Safe Connections (which ensures rough sleepers without a local connection to Tower Hamlets have a safe place to go) and the Pan-London Accommodation Network.

**Regional options and Inter-borough swaps**

The council is committed to working in partnership and make referrals to regional resources such as the East London Women’s Project and the Inside Out Project for lesbians, gay men, bisexuals, transgendered individuals and non-binary clients.

We have also had great success in conducting inter-borough swaps with Westminster, Lambeth and Hackney councils. When rough sleepers are at high risk if they remain accommodated in Tower Hamlets or their needs are so complex that they have exhausted their housing options in the borough, inter-borough swaps are arranged and clients are swapped to offer them a fresh start in a new area.

**Move on Accommodation**

Due to the decrease in hostel bed spaces in Tower Hamlets, it is planned that this will be mitigated by a more robust ‘moving on’ process whereby residents will be more quickly placed into long-term housing. The move on option for rough sleepers is the GLA funded Clearing House managed by St Mungo’s. The Clearing House matches referrals from rough sleepers with ring fenced RSL properties anywhere in London. The accommodation is provided for two years with an option of continuing the tenancy if the client is not ready to move into the private rented sector. Tenancy Sustainment support is provided to clients. The Clearing House also provides Tower Hamlets with a yearly quota of properties for
high needs clients. The council is committed to continue to support and utilise the Clearing House to provide long term accommodation to our rough sleeping population. In exceptional circumstances, where a rough sleeper is assessed as needing to remain in the borough, a social housing quota can be used.

**Housing First**

In the autumn 2018/19, the council has committed to conducting a Housing First pilot for complex needs rough sleepers. This will be funded through the MH CLG’s RSI Winter Programme and the council’s DAT service and delivered in partnership the Housing Options Rough Sleeping Service, a local RSL and an established Housing First provider. There will be a designated personalised budget for each client to help with home furnishings and spot purchase of specialist services, e.g. trauma informed psychological interventions. Funding permitting, the council would like to expand this pilot on an incrementally basis.

**Support to non-UK national rough sleepers**

The council recognises that non-UK national rough sleepers in Tower Hamlets have arrived in the borough under various circumstances and their access to resources may differ from UK nationals. The council is committed to providing support directly or through partner agencies to non-UK nationals who are rough sleeping by:

- Offering stabilisation services to prepare people for supported voluntary reconnection
- Referral to specialist advice agencies and the Home Office to resolve undocumented migrants’ immigration status
- Supporting clients into employment where appropriate.

Our partners who offer direct support to non-UK nationals are:

- St Mungo’s who currently provide 50 bed spaces to people who have no access to benefits or statutory services in the UK. These bed spaces ensure that non-UK nationals do not have to rough sleep whilst a decision is being made on their immigration status or their entitlements are resolved. They plan to expand their capacity and are currently piloting a scheme to provide one ring fenced bed space in each of their accommodation projects. St Mungo’s also provide a comprehensive European-wide voluntary supported reconnection programme.
- Praxis who provide specialist legal advice and specialist accommodation for non-UK nationals.
- Providence Row who provides housing assessments, employment support, supported reconnection support and referrals into GrowTH evangelical winter night shelter for rough sleepers with low support needs.
- Crisis who provide employment support and referrals to GrowTH.
The council supported Praxis in a bid to the GLA’s Innovation Fund to assist non-UK nationals who are at risk of rough sleeping upon discharge from the Royal London Hospital. Praxis was successful in this bid and will be working on Tower Hamlets to deliver this service from 2018-2020.

**Strategic forums and models to support rough sleepers and reduce anti-social behaviour associated with some rough sleepers**

**Support and Enforcement Model**

Rough sleeping is not illegal and the council does not aim to criminalise individuals for sleeping on the street. We do, however, have a responsibility not only to the individuals rough sleeping but to the community as a whole, and in many circumstances rough sleeping comes hand in hand with particular anti-social behaviours.

The council will continue to implement a Support and Enforcement model to support rough sleepers and reduce anti-social behaviour. Genuine offers of support and accommodation will always be the main approach to end rough sleeping but where this approach is consistently unsuccessful, we will work closely with enforcement agencies and the wider community to reduce the anti-social behaviour that some of our rough sleeping population exhibit (e.g. aggressive begging, littering, blocking public byways with encampments, setting up tents in public parks, creating excessive noise). Offers of support will continue to be made even when enforcement actions are being taken against an individual.

**Forums and Tasking Meetings**

- The council’s rough sleeping team chair a monthly Tasking and Care Planning Meeting for Rough Sleepers and those with a Street Lifestyle. This meeting brings together support and enforcement agencies to case conference and develop plans for entrenched rough sleepers and to develop rough sleeping hotspot management plans.

- The council’s rough sleeping team works closely sits on a number of multi-agency panels to support vulnerable clients and/or reduce anti-social behaviours, including the Community ASB MARAC, DV MARAC, TH Prostitution Partnership, Adult Safeguarding High Risk Transitional Panel, and local Ward Panel meetings.

**Tower Hamlets Rough Sleeping Action Plan**

Each year the council will update its Rough Sleeping Action Plan which sits alongside this section of the Homelessness Strategy.
8.4 Provision of Services - Theme 4: Specialised support for vulnerable Children, Families and single adults

Objectives

In order to prevent families, young people and vulnerable adults becoming homeless, we will provide appropriate support packages for those who do, we will:

Prevent homelessness among families and young people as part of an integrated approach to youth and family services by:

- Improving joint working across agencies to focus on homelessness prevention and early intervention for families and young people
- Improving the use of mediation and respite to address family breakdown as a cause of homelessness.

Support homeless families and young people to be safer, healthier and emotionally and economically resilient by:

- Providing better support services for homeless families
- Support homeless young people to achieve their full potential and positively progress to adulthood
- Support vulnerable adults at risk of homelessness through bespoke pathways.

How we will deliver this priority:

Response to assisting victims of Domestic abuse who are placed in emergency accommodation

In the first instance, the Council will consider Sanctuary schemes to enable victims of domestic violence to remain in their homes. In addition we provide a multi-agency risk assessment conference (MARAC) approach which enables a bespoke support response to be provided to each individual household. We also commission independent domestic, sexual and gender-based violence advocates (IDVAs) to help victims apply for legal orders such as occupation orders, Non Molestation Orders (NMOs) and coordinate weekly Domestic Violence One Stop Shops where solicitors and Housing Services are available to provide advice. LBTH also have a Specialist Domestic Violence Court Coordinator who works with victims to ensure successful prosecutions and restraining orders are put in place.

Where appropriate and safe to do so, the council would consider granting a new tenancy to victims of Domestic Violence as long as it’s the best option available for the victim, accommodation is of right size and makes best use of the Council’s resources. The Council’s Housing Management Panel would consider such cases and decide whether discretionarily priority and a direct offer can be made and a new tenancy granted to the victim subject to joint tenancy being brought to an end.
Victims of domestic abuse placed in refuges

The Council takes two different approaches to meeting the needs of victims of domestic abuse who are housed in refuges dependent upon their household status.

**Victims with children:** LBTH currently applies statutory homeless residency requirement for these households, they can join the Council’s Common Housing Register and are given priority band 2b which covers applicants in housing need without a local connection to the borough. The policy then requires them to live in the borough continuously for 3 years before they are elevated to priority band 2A.

Dependent upon the outcome of this consultation and internal policy consideration, the Council could consider using its exceptions policy and accept applicants with complex needs to higher priority band 2A which includes overcrowded and homeless applicants or even band 1 on medical or social grounds. Discretionary priority on social grounds is considered by the Council’s housing management panel, which meets each month to consider cases.

**Victims without children:** Under the present allocations scheme, these households are not considered in priority need unless they are accepted as being vulnerable. However the Council has a policy to consider vulnerable people who need to be rehoused into social housing because private sector accommodation isn’t suitable for them but are in supported accommodation. The policy enables the Council to provide a programme of move on accommodation with a quota of up to 10 permanent move on spaces made available each year. This frees up valuable supported housing spaces for other victims who require this type of accommodation.

Generally, any single vulnerable homeless applicants owed a fully homeless duty are placed in priority band 1b.

**Services to Under 18’s**

The HOST Young Persons Social Worker sees all homeless clients aged 16 and 17 years, including those who are pregnant, and will undertake Children's Act social work assessments.

The Council has commissioned accommodation and support service to help prevent and reduce young people from becoming homeless. The Service, run by One Housing Group, aims to eliminate the need for bed and breakfast and temporary accommodation for 16 and 17 year olds, it will facilitate a safe return home where possible, and help young people into longer term accommodation. The service is aimed at, although not restricted to, young people aged between 16 and 21 and a minimum of 10 young people will be housed at a time. A ‘crash pad facility’ consisting of two bed spaces is also available for emergency cases and short term accommodation (24-48 hours).
Supporting Vulnerable Adults

In order to provide targeted support in line with the new duties set out in the Homelessness Reduction Act for vulnerable homeless adults and support them to live independently, we will:

Better identify the needs of vulnerable people through a personalised, multi-agency approach by:

- Improving the assessment of vulnerable adults, particularly those with multiple needs
- Ensuring that structures and processes are in place to support a multi-agency approach to assessing vulnerable adults.

Address and reduce the support needs of vulnerable homeless people to enable them to live independently by:

- Improving move-on options for people in hostel accommodation and independent living skills of homeless people
- Supporting ex-offenders in tandem with the Probation Service to keep their homes or find suitable accommodation on return from prison
- Ensuring a secure passage for homeless people following Hospital discharge.
9.0 Appendices:

- Homelessness Evidence Base
- Evaluation of Consultation
- Equality Impact Assessment
- Details of Homelessness Partners and Board
- Overview and Scrutiny – Effectiveness of Health and Social Care provision for homeless residents – 2018

Health and Homelessness Scrutiny Review

Please note appendices will be attached to the final document.