

Call for Evidence: The Mayor's Rough Sleeping Plan of Action – St Mungo's Response

Consultation Questions¹

About us

1. Your organisation type *
 - Individual
 - Local authority housing service
 - Local authority homelessness service
 - **Voluntary and community sector organisation**
 - Health-related service
 - Registered social landlord organisation
 - Private rented sector organisation
 - Research or academia
 - Commissioner
 - Other
2. If you are representing a service delivery organisation, who does your organisation support? List any particular groups of people experiencing rough sleeping that you support – for example non-UK nationals, women or people from LGBTQ+ communities.

We support people who are homeless or at risk of homelessness and people who are experiencing rough sleeping. We support a wide range of people from different groups and demographics who experience rough sleeping, including non-UK nationals, women and people from the LGBTQ+ community.

3. If you're representing a service delivery organisation, where does your organisation deliver support for people experiencing rough sleeping? *

Select all that apply.

- South West London
 - South East London
 - North Central London
 - North West London
 - North East London
 - **All areas in London (pan-London)**
 - Does not apply
4. Select the closest description of your role in the organisation *
 - Frontline professional (case holding)
 - Commercial
 - Senior leadership
 - Programme management
 - **Policy, public affairs or communications**
 - Researcher
 - Other
 - Does not apply

¹ Call for evidence: the Mayor's Rough Sleeping Plan of Action | London City Hall

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Building a shared mission to end rough sleeping

The Rough Sleeping Plan of Action will be the strategic framework used to deliver the Mayor's commitment to set London on a course to end rough sleeping in London by 2030.

Rough sleeping is not the only form of homelessness, but it is a particularly dangerous form of homelessness. It is unacceptable that anyone should have to sleep rough in London.

When it comes to tackling rough sleeping, we need to set our expectations high and never tolerate the fact someone is forced to sleep rough. That's why we've set an ambitious goal of ending rough sleeping by 2030.

Delivering this ambitious goal requires co-ordinating partners across London behind a shared understanding of the causes, challenges and solutions required to address them.

Ending rough sleeping in practice needs a set of functional measures that capture progress towards this goal. We propose these measures are based on the Ending Rough Sleeping Data Framework.

This framework tracks progress on preventing rough sleeping wherever possible. And where we cannot prevent it, providing the support needed to make it rare, brief and not repeated.

This is an approach that has been developed between the public and voluntary sectors and tested across the country.

Your thoughts

5. Is this definition of our goal the right way to frame and articulate ending rough sleeping in this Plan of Action?

Overall, we agree that this definition of the goal is the right way to frame and articulate ending rough sleeping in the Plan of Action. The Ending Rough Sleeping (ERS) Framework has already organised sector thinking around these principles and we have a reporting logic in place.

6. How can we make best use of data and evidence in how we design and deliver services, accommodation, and strategies?

There are several useful datasets and tools which provide data and evidence which should be used to help design and deliver services, accommodation and strategies:

- The Ending Rough Sleeping Data Framework is a very helpful tool to evaluate the national picture. However, the last data release was December 2023, but it should be released quarterly. Regular reporting is needed to support work on ending rough sleeping.
- The GLA and London Council's Strategic Insights Tool (SIT) was intended to bring together data from separate systems across the sector to provide the insights necessary to work towards making rough sleeping, rare, brief and non-recurring. The current state of this tool and future of it is unclear and so it would be useful for this tool

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to be developed and embedded in work towards ending rough sleeping in London if it can practically benefit practitioners and providers as well as strategic leads.

- The Combined Homelessness and Information Network (CHAIN) is by far the best tool we have in terms of analysing Rough Sleeping trends in London. The multi-agency approach helps paint a fuller picture with the data. There are some limitations however, which would be helpful to be addressed to better support work towards ending rough sleeping. For instance, The ability to manipulate and analyse CHAIN data in greater depth is limited – a reporting suite that providers such as us could use to dig deeper into the data would be useful. We understand that there is work underway to develop CHAIN outreach dashboards which is a positive step and could greatly help alleviate this limitation. This will be vital for improved working towards ending rough sleeping in London as it will help providers better understand emerging trends and support shift planning and resource allocation.

Additionally, from our work as a frontline service provider, we think improved focus should also be given to the following areas in terms of data and evidence, as these could be used to help design and deliver services, accommodation, and strategies better.

- **Improving data collection on the upstream drivers of rough sleeping** - this would be an extension of the current focus on 'last settled base. This could benefit identification of where to apply preventative interventions further upstream and stop people falling into rough sleeping in the first place.
- **Improved understanding and analysis of 'flow' data** - by 'flow' we are referring to the category in CHAIN data which is people who had never been seen rough sleeping prior to the reporting year. Though we think it is right that the number of people who are new to the streets is rightly a priority area of focus for data and reporting, the number of people 'only seen once' by Outreach teams can skew analysis. Specifically, we have no facility to filter out records for those recorded as 'unknown' street contacts.
- **Degree of local authority support** - improved analysis and evidence of how much local authority support has been provided before someone ends up on the streets could help better design approaches. For instance, knowing whether a person approached the local authority for support and if not, why or what worked or didn't work. This could help identify challenges upstream and improve preventative work.
- **Effective Solutions** – Utilise what solutions are demonstrably most effective when preventing rough sleeping or making it rare, brief or non-recurring. For this to be effective, a common performance framework could be used to inform evaluation. This would work well alongside a 'test and learn' approach.
- **Variations in regional demand** – It would be worthwhile factoring differences in regional demand as this can inform commissioning approaches.
- **Cost benefit analysis** – A cost benefit analysis of interventions at a strategic level (i.e. the GLA) would be useful to support future funding decisions and allocations.

7. How can we ensure work to end rough sleeping in London is sufficiently integrated with work to end wider forms of homelessness?

The shift towards prevention and away from just a relief-focussed approach, will help to ensure work to end rough sleeping in London is sufficiently integrated with work to end wider forms of homelessness. This includes the shift to processes such as identification, assessment and away from verification.

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All forms of homelessness are a failure of prevention efforts to some extent. Moving the rough sleeping interventions upstream is a move to view rough sleeping within the wider context of other forms of homelessness. The Rough Sleeping Prevention Project (RSPP) has demonstrated the difficulties of doing so however, particularly where greater integration with statutory services is required. Those services are typically overwhelmed, poorly resourced and struggle to pivot in new directions or introduce changes in practice and culture quickly.

There is room for improvement in the understanding between the statutory and non-statutory sectors resulting in lower levels of collaboration, trust and goal sharing. This is an area that requires further evaluation to inform efforts to better integrate our approach.

Delivering the right services, housing and interventions

Our Plan of Action will review the current state of service provision, and the changes needed to interventions at different stages of people's journey onto and off the streets. This will include:

- looking at the current barriers at each stage of an individual's journey
- the funding, services and housing needed from central and local government, the NHS, GLA and voluntary sector to end rough sleeping at each stage.

As part of this, we'll look at how everyone can access the tailored support they need, including groups with specific barriers and needs, such as non-UK nationals and women. Based on our experience and initial conversations with partners – and aligning with the definition above – we're suggesting prioritising action on these three fronts:

- Preventing rough sleeping: supporting 'upstream' interventions to stop someone sleeping rough in the first place.
- Making rough sleeping as brief as possible: providing everyone with an immediate route off the streets.
- Stopping people returning to rough sleeping: providing sustainable accommodation and ongoing support.

Your thoughts

8. Do you agree that these three areas capture the priority areas for action to end rough sleeping?

Yes, these three areas capture the priority areas for action to end rough sleeping. However, it is also important to note that one area should not have a disproportionate focus to be to the detriment of other areas. For instance, we agree that there should be a focus on prevention, but it should not be to the detriment of making rough sleeping as brief as possible as there is still an ongoing rough sleeping emergency.

These three areas rightly focus on practice, but they should also include policy change too, to not risk that we focus on only practices which are restricted by policy.

9. Thinking of activity happening in these three areas now, are there any areas where you think current practice is working well? Please include any particular examples of good practice that you would like to see being used more widely.

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In terms of the first area, *Preventing rough sleeping: supporting 'upstream' interventions to stop someone sleeping rough in the first place*. The Rough Sleeping Prevention Project (RSPP) is new, however, the model of rapid assessment and reconnection is tried and tested and is an example of good practice. However, to help expedite the use of this model to be used more widely, the pilot needs to be evaluated to help refine its application within a preventative context. This would include reviewing the effectiveness of the Rough Sleeping Risk Assessment tool and its points of access such as expanding it to beyond Housing Options teams and reaching people where they are, instead of where we hope they will be. Regardless of how the model develops, the intention of identifying those at greatest risk of entrenched rough sleeping and diverting them before they hit the street is the correct one.

In terms of the second area, *Making rough sleeping as brief as possible: providing everyone with an immediate route off the streets*. NSNO is highly effective in this space. The quality of a No Second Night Out (NSNO) intervention also has a demonstrable impact on reducing the recurrence of rough sleeping. Of the 1852 clients the service has supported in the past 12 months, only 16% have returned to rough sleeping. The greatest challenge for the service is meeting demand, particularly with the number of people rough sleeping increasing sharply whilst access to Private Rented and Supported Exempt accommodation is declining. As the Rough Sleeping Prevention Project (RSPP) has demonstrated, the rapid assessment and reconnection model is portable and can be applied at any stage of the journey, from prevention to relief.

And regarding the third area, *Stopping people returning to rough sleeping: providing sustainable accommodation and ongoing support*. The quality and effectiveness of supported housing (including hostels) and floating support (including Housing First) varies dramatically. However, there are good examples we can draw upon. For example, Camden Housing First is a good example of an effective Housing First service. Additionally, Hope Gardens in Hammersmith and Fulham is a good example of a truly psychologically informed hostel.

10. Again thinking of current activity across these three areas, where are the major gaps in funding, services and support? Please give specific examples if you can.

The most obvious major gap across these three areas is the third area, with an absence of preventative interventions. The focus has primarily been on the emergency response to support people off the streets – especially amidst rising numbers. However, to help end rough sleeping in the long-term, in addition to maintaining the emergency response, improving preventative work further upstream will be vital. To address this, we will need to establish a) how to identify those most at risk, b) where these people are most likely to attempt to access support (if at all) and c) what interventions work most effectively to prevent a period of rough sleeping. A test and learn approach could be a useful means to achieve this, given the absence/scarcity of existing interventions.

It needs to be established and agreed how far upstream, prevention measures should go. Prevention measures could go back a long way in someone's journey onto the streets, but it needs to be agreed what is most useful, reasonable and effective. For instance, should interventions extend into tenancy support and if so, who should be the beneficiaries of this support and how do we identify them?

Another gap is that we need a thorough assessment of off-street accommodation capacity. Anecdotally we understand the volume of units/space has decreased whilst numbers on the

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streets increase. This drives an increase of those who are new to the streets becoming entrenched. An audit similar to London Council's SWEP capacity audit would be helpful in this regard.

Supported housing is an essential solution to rough sleeping, however, much can be done to improve its effectiveness and efficiency. Many supported housing services are under-funded, others do not make the best use of the resources available to them. It is also worth considering supported housing as a resource within a much wider eco-system of resources and support. Good supported housing cannot help people rebuild their lives or prevent a return to the streets effectively unless it can a) provide sustainable move-on accommodation, b) ensure people's safety (physical and psychological) and freedom from violence, c) ensure access to a sufficient income and d) facilitate access to healthcare. Provision of inclusion health services is currently piecemeal, and it would be helpful for this to be expanded. It is highly effective where it can be found.

Access to good immigration advice is also essential for the high volume of people on the street with an immigration support need. We need to regularly assess access to advice and ensure provision is adequate.

11. What new interventions and policies are needed to achieve a stepchange in impact across these areas, including for groups who may be less able to access generic services? These can be actions for central government, the GLA, or local authorities.

There are numerous policy changes which are needed to achieve a stepchange in impact across these areas. Some of our top-level priority areas are outlined below:

1. Extend and Uplift Funding
 - **The Government should commit to extending and uplifting Rough Sleeping funding for at least the duration of the Spending Review period to avoid annual bidding rounds and guarantee that any move away from this model is accompanied with a reasonable transition period to sustainable future funding, enabling long-term work to end homelessness to be the most impactful.**
2. Preventing Renters from falling into Homelessness
 - **To help protect renters from homelessness by raising standards, increasing affordability and improving security of tenure for private rented homes.**
3. Prevent Homelessness from Government Institutions
 - **Reform practices to prevent homelessness from government institutions and commit to extending the move-on period from Home Office Accommodation for newly recognised refugees from 28 days to at least 56 days.**
4. Reform the Welfare System
 - **Align benefits by increasing the benefit cap to allow people to claim the full amount they are entitled to under LHA rates and creating parity between the taper rates of Housing Benefit and Universal credit by setting them at 55% and increasing the Housing Benefit disregard to make work pay for those in supported housing.**
5. Address Unmet Health Needs
 - **Address unmet health and care needs which are a cause and consequence of homelessness and rough sleeping by reforming our health system to prioritise people with multiple complex needs. Starting with requiring Integrated Care Boards to have a dedicated focus on tackling health inequalities for inclusion**

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health populations, with sustainable ring-fenced funding to meet this requirement.

6. Build more Social Rented Homes

- **Commit to delivering the sector recommended target of building 90,000 social rented homes a year and to a 10-year plan to meet housing need accompanied by significant investment in grant funding.**

Women's Homelessness

We also think it is important that there are dedicated measures to tackle homelessness for women to address the unique challenges women face and the fact that the full scale of homelessness for women is often not captured. As such, we support the Women's Rough Sleeping Census [Manifesto for Change](#) and its recommendations for the Mayor's Rough Sleeping Plan of Action. The recommendations cover five key areas as follows:

1. Definition

- Set out a gender-informed understanding of how women experience rough sleeping which considers the intersectional experiences of women. It can be used in all London boroughs to guide outreach practice and ensure access to rough sleeping support and accommodation.

2. Data

- Incorporate a clear commitment to supporting all London boroughs in undertaking an annual women's rough sleeping census and reporting on their findings.
- Review and reconfigure existing data collection methods and systems so that women are accurately represented, including Black and minoritised women.

3. Equity and Safety

- Detail how it and resulting measures will meet the needs of all groups, including women of different ages, migrant women, LGBTQ+ people, and Black and minoritised women.
- Commit to co-creating a gender-informed equalities impact assessment, which can be used to assess and improve all rough sleeping services and provisions and ensure safety and equity of access for women, including the GLA's programme of services.

4. Integration

- Ensure its measures are linked with those of other London-wide and mayoral-led strategies, including, for example, the Domestic Abuse Safe Accommodation strategy.
- Set out measures to establish an integrated women's homelessness pathway in all London boroughs, building on the learning from the two boroughs piloting the women's census crosssector approach and including VAWG and specialist 'by and for' organisations.

5. Prevention and Intervention

- Commit to resourcing 24-hour women's hubs in each London subregion where women can present, self-refer or be referred by any agency and immediately be given a safe place to spend the night, access housing advice and support, VAWG and health support, and a longer-term housing plan.

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- Set out measures to establish an integrated women's homelessness pathway in all London boroughs, ensuring that this pathway includes sufficient, safe and specialist support and accommodation for women rough sleeping in London.
- Dedicate resources to understand and respond to the gaps between rough sleeping provision, statutory housing provision, VAWG, and refuge provision.

Homelessness from asylum accommodation

There have been large increases in the number of people rough sleeping who have left asylum accommodation and so a focus should be given to preventing homelessness for this group. Below is a summary of interventions we recommend are implemented by the Home Office, MHCLG and DWP to avoid people becoming homeless when they leave asylum support accommodation.

Operational changes

1. Ensure timely and comprehensive upstream **data sharing** with local authorities (and where appropriate, the voluntary sector) relating to all people impacted by the ending of their asylum support in both contingency and dispersal accommodation.
2. Clearly **communicate** to newly granted refugees about the ending of their asylum support, in an appropriate language and in a trauma informed approach, including the steps that they should take to secure accommodation and the support that is available to them (see leaflet we have drafted that can be distributed).
3. Issue **clear guidance to local authorities** that a newly recognised refugee is at risk of homelessness from the moment they receive notification of the decision on their asylum claim and so is eligible for homelessness prevention support from that time. Local authorities should not require the notice to quit or the letter stating someone's entitlement to asylum support will end before they provide assistance.
4. Invest in preventive approaches to homelessness that involve local authorities. Build on the use of Home Office Liaison Officers in asylum support accommodation in Hillingdon, Brent and Glasgow and transition to a model led by local authorities, specifically through the **Local Authority Asylum Support Liaison Officer (LAASLO) model**. Implement LAASLOs in all local authority areas with a high number of people leaving asylum support accommodation to ensure that people are supported to navigate the move on process.
5. **Stagger cessations/evictions** from Home Office accommodation so that local areas are not overwhelmed and **allow discretion** to delay cessations/evictions for a few days if the person is working with their local authority or a third sector organisation to prevent their homelessness in line with the Homelessness Reduction Act. The Government should work closely with statutory services and civil society organisations to manage the increase in demand for support.
6. Where rough sleeping among newly granted refugees has not been avoided, **provide emergency funding** to divert people away from the streets through specialist support services. This would relieve pressure on already stretched street outreach services and provide rapid, early intervention that enables access to accommodation and other related support.

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7. **Avoid moving** newly granted refugees who have already been served notice to leave asylum support **to another local authority area**; movement across local authority boundaries will disrupt efforts to prevent their homelessness.
8. Ask Home Office providers of asylum support to halt cessations/eviction from asylum support for the full duration of **extreme cold weather**.
9. **'Passport'** newly granted refugees through the DWP's initial **Universal Credit 28-day assessment period**, on the basis they have already demonstrated destitution to have received asylum support. This would enable quicker confirmation of claim and remove a barrier to accessing the private rented sector. Note: there would be no requirement for earlier payment.
10. Work with local authorities, experts within the voluntary sector and people with lived experience to enable early intervention to avoid rough sleeping among asylum seekers who received **negative decisions or whose claims are withdrawn**.
11. **Provide refugees with all their documentation at the same time**. Specifically, people should receive their refugee grant letter, their BRP, the letter containing the date when their asylum support will end, and the notice to quit their accommodation on the same day.
12. **Commit to not serving notice** to end asylum support for those granted refugee status until they have received their biometric residence permit.
13. While the government takes steps to digitalise the immigration system and carry out the transition from BRPs to electronic visas, they should ensure people and support organisations are given enough time and assistance to make this transition. If necessary, steps should be taken to pause, delay or phase the roll out of the digital system. During this time the government should **guarantee access to some form of physical ID**.

Wider systemic changes

1. **Extend the move-on period** from 28 days to at least 56 days to bring it in line with local authorities' duties under the Homelessness Reduction Act to enable people (and local authorities, where they have a duty) to have more time to find suitable move on accommodation and access the support they are entitled to.
2. **Extend the 'duty to refer'** to the Home Office to cover newly granted refugees leaving asylum support.
3. Fund local authorities to enable commissioning of **specialist housing support programmes** to assist newly granted refugees to access accommodation and appropriate wrap around support, based on learning from criminal justice and hospital discharge service models. This should include the government working with all local authorities to establish a fund that would cover the cost of tenancy deposits for new refugees.
4. Provide additional funding to local authorities to deliver a **floating support** model to enable refugee resettlement and integration and prevent future homelessness.
5. Commission the **provision of 'Emergency Accommodation'** to newly granted refugees who are not able to secure accommodation in 56 days, building on the learning from the Community Accommodation Service for prison leavers, currently funded by the Ministry of Justice.
6. Work across government, including with the Department of Work and Pensions, to ensure newly recognised refugees can access **sufficient support needed to prevent**

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their homelessness, including amending the Shared Accommodation Rate exemption guidance so that it doesn't prevent young refugees from securing accommodation.

Building new London-wide approaches to collaboration

London is lucky to have many individuals and organisations dedicated to seeing an end to rough sleeping.

Our Plan of Action will aim to encourage new ways of working to ensure that everyone is able to play a full part in achieving this goal.

We know that emergency homelessness services are essential, but on their own they won't end rough sleeping.

We need a new coalition – from health to housing, the Home Office to the prison system – to play their part, with shared goals, roles and responsibilities. Your thoughts

12. What should be the respective roles of central government, the GLA, local authorities and the voluntary sector in ending rough sleeping?

The key point when it comes to the roles of different partners is that they need to be clearly defined within an accountability framework where possible. This will help to mitigate the confusion which currently occurs around who is responsible for what. This can then translate into the commissioning system to improve join-up.

London Councils also have an important role to play in the analysis and unblocking of key issues, particularly in leveraging key relationships, or helping the voluntary sector understand the pressures local authority partners face.

The Ministry of Communities, Housing and Local Government (MHCLG) can monitor local performance and the need for gap funding where demand overwhelms supply at a local level. They also play an important convening role and can help bridge the gap across different departments. With MHCLG working on a cross-departmental strategy for tackling homelessness, it is vital that this is also joined up with the Mayor's Plan of Action. This is particularly important to when it comes to preventing people from government institutions who end up sleeping rough, such as prisons, care and asylum accommodation.

The voluntary sector is, primarily, a collection of service providers and holds a lot of expertise in terms of non-statutory interventions. Much of the focus has been on emergency response but there will need to be a pivot towards prevention. This will require a significant shift in mindset and an appetite for risk and experimentation. However, this is made very difficult by the challenging financial position faced by all voluntary sector providers. Long-term funding and certainty are vital for the voluntary sector's expertise to be maximised.

13. Would you support the greater use of subregional structures within the rough sleeping ecosystem in London? For example, co-ordinating services across south west London, or north east London. Please include any views you have on how to improve such subregional structures to maximise their impact.

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In principle we would support the greater use of subregional structures within the rough sleeping ecosystem in London. However, sub-regions have spoken quite openly about their reservations about such models, and these should be considered if greater use of these structures is to be proliferated. The concerns are primarily because the structures are often not well established, or because they lack influence over local authorities who are understandably reluctant to show flexibility in terms of their own resources.

Some types of intervention would lend themselves well to sub-regional/Pan-London commissioning such as those that can easily be delivered across boundaries. Housing First for instance would lend itself to this. Greater use of sub-regional/pan-London structures should therefore be on a case-by-case basis where most appropriate and beneficial.

14. How can the GLA and the Mayor use their role and powers to support different public and voluntary services to work together in a coordinated way? We would welcome examples from other cities in the UK and across the world.

The most tangible way for the GLA and the Mayor to use their role and powers to support different public and voluntary services in a coordinated way is to directly convene partners around the table for a coherent strategy with clear roles and responsibilities. As we know, the causes and consequences of rough sleeping are complex, and as such the multi-agency approach needed is complex too. Bringing pan-London services together would help with this.

Permissions

15. I agree to be contacted by the GLA about my response to the Rough Sleeping Plan of Action call for evidence *

Agree

16. I agree for my response to the Rough Sleeping Plan of Action call for evidence to be reproduced publicly in future communications about the Rough Sleeping Plan of Action

Agree

17. I have read the Rough Sleeping Plan of Action privacy policy - Read the privacy policy.

Yes