
Cabinet

10th December 2019

Name of Cabinet Member:

Cabinet Member for Housing and Communities – Councillor T Khan

Director Approving Submission of the report:

Deputy Chief Executive (People)

Ward(s) affected:

All

Title:

Adoption of Rough Sleeping Strategy 2019-2024

Is this a key decision?

Yes – the Strategy will have an impact on all wards of the City

Executive Summary:

The Council is required by the Ministry of Housing, Communities and Local Government (MHCLG) to publish a Rough Sleeping Strategy by December 2019. Following engagement with key stakeholders, a draft Strategy and Action Plan 2019-24 was widely consulted on from 18th September to 30th October 2019. The results of this consultation are summarised in section 3 of this report and appendix D.

The Rough Sleeping Strategy focuses on three main principles:

1. To prevent new people from starting to sleep rough
2. To intervene rapidly when people start to sleep rough to help them off the street
3. To promote a person's recovery once they are off the street to build positive lives and so they do not return to rough sleeping

The Strategy is supported by an Action Plan that will remain a live document and be monitored and delivered by the City Council and its relevant partners.

Recommendations:

The Cabinet is requested to:

- 1) Consider the consultation responses received to the draft Rough Sleeping Strategy 2019-2024 and the summary report provided at Appendix C to the report.

- 2) Recommend that the City Council adopts the new Rough Sleeping Strategy 2019-2024, attached as Appendix A to the report, and the supporting Action Plan, attached as Appendix B to the report, with immediate effect.

List of Appendices included:

Appendix A – Rough Sleeping Strategy 2019-24
Appendix B – Partners Commitment
Appendix C – Rough Sleeping Action Plan
Appendix D - Consultation Statement
Appendix E - ECA Part 1&2

Background papers

None

Other useful documents

[Coventry's Housing and Homelessness Strategy 2019-2024](#)

Has it been, or will it be considered by Scrutiny?

The draft Rough Sleeping Strategy was considered by the Communities and Neighbourhoods Scrutiny Board (4) at its meeting on the 14th November 2019.

Has it been, or will it be considered by any other Council Committee, Advisory Panel or other body?

No

Will this report go to Council?

No

Report title: Rough Sleeping Strategy 2019-2024

1. Context (or background)

1.1 The Ministry of Housing, Communities and Local Government (MHCLG) has made addressing rough sleeping in England a priority. They have committed to halve rough sleeping in this Parliament and to end it by 2027. MHCLG have produced their own Rough Sleeping Strategy and one of the requirements is for individual council's to develop their own strategies and action plans by December 2019. Further information on the Government's Rough Sleeping Strategy can be found at: <https://www.gov.uk/government/publications/the-rough-sleeping-strategy>.

1.2 The Rough Sleeping Strategy and its Action Plan are reflective of and intrinsically linked to the Council's Housing and Homelessness Strategy (2019-24). The two strategies need to be considered and delivered in tandem. The Housing and Homelessness Strategy sets the vision for housing in the city and our priorities. Under Theme 1 it describes developing measures to tackle rough sleeping and support vulnerable people who are (or are at risk of) rough sleeping and understanding the reasons for non-engagement.

1.3 Across England Government statistics show that there has been a 160% increase in rough sleeping since 2010. Coventry has also experienced a significant increase during this period and particularly during the last few years. Official figures demonstrate there has been an increase in numbers from 6 in 2014 to 25 in 2018. This represents a 316% increase in rough sleeping in Coventry over the last 5 years.

Table1 – The increase in the number of rough sleepers on a yearly basis since 2014 in across the West Midlands Combined Authorities

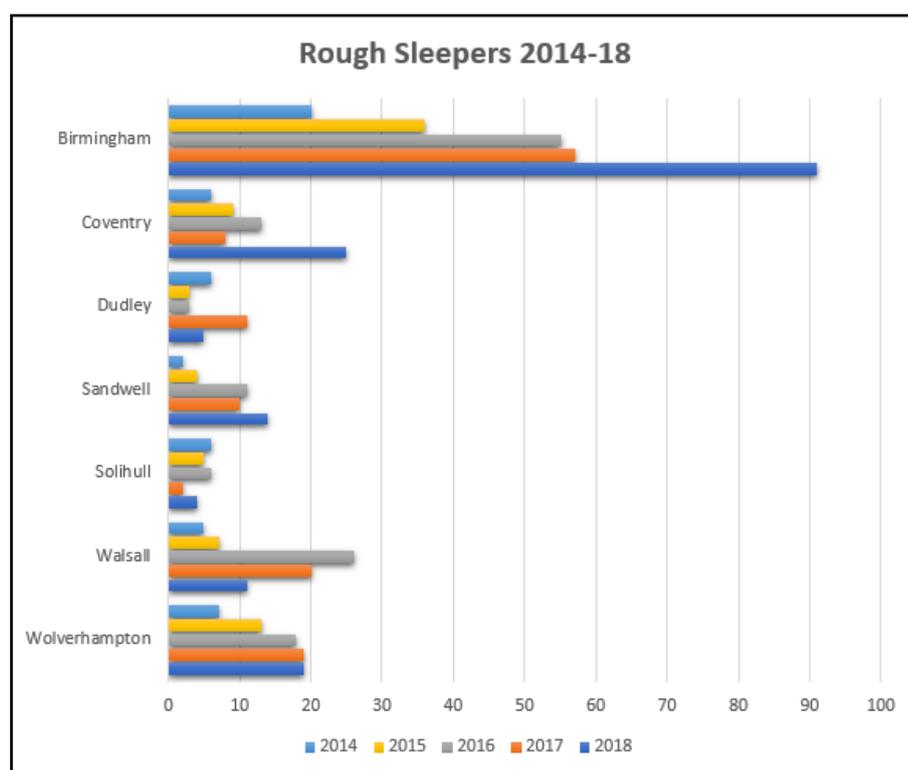


Table 1 – A table showing the increase in the number of rough sleepers on a yearly basis since 2014 in across the West Midlands Combined Authorities

	Coventry	Birmingham	Dudley	Sandwell	Solihull	Walsall	Wolverhampton
2014	6	20	6	2	6	5	7
2015	9	36	3	4	5	7	13
2016	13	55	3	11	6	26	18
2017	8	57	11	10	2	20	19
2018	25	91	5	14	4	11	19

1.4 The Council welcomes the requirement for a Rough Sleeping Strategy and Action Plan. This will help raise the profile of the issues and challenges around rough sleeping whilst ensuring there is a planned approach to how we can effectively work together to ensure that no Coventry citizen has to bed down on the streets. The Strategy includes a target and vision to eliminate rough sleeping in the city by 2022.

1.5 There is already exceptional commitment, passion, drive and innovation across the City to support and help our rough sleepers off the street. However, we recognise we need to be doing more, and in a more joined up way to ensure our actions are 'SMART' if we are going to meet our own and Ministry of Housing, Communities and Local Government aspiration to eradicate rough sleeping by 2027

1.6 The Rough Sleeping Strategy focuses on:

- The current position in the city.
- Where we want to be.
- What tools and services are already in place.
- How we can maximise their impact.
- What are the gaps and how we will address these.

These elements will be considered for current, future and hidden rough sleepers.

2. Options considered and recommended proposal

2.1 **Option 1 is to implement a Rough Sleeping Strategy without Consultation.** This is not recommended as an option. It would involve the Council choosing to implement the Rough Sleeping Strategy without consulting with Coventry's citizens, and other impacted stakeholders. To reduce rough sleeping in the City it is imperative that a partnership approach is in place as the Council's on its own cannot meet the challenge. This can only be achieved by involving and consulting with both, statutory, voluntary and community organisation, as well as rough sleepers.

2.2 **Option 2 is to not publish a Rough Sleeping Strategy.** This is not recommended as an option. Failure to publish a Rough Sleeping Strategy will be challenged by the Ministry of Housing, and Communities and Local Government which states that it is a requirement for individual council's to develop their own Rough Sleeping Strategies and Action Plans by December 2019.

2.3 Option 3 is to publish a rough sleeping Strategy and not implement the strategy. This is not recommended as an option. If we publish our Rough Sleeping Strategy and fail to implement the actions, it will impact on our reputation as it will appear that we are not committed and supportive of central governments aspiration of eradicating rough sleeping by 2027. Furthermore, public perception of our commitment as a local authority who is supportive and caring to the most vulnerable people in our society will be challenged.

2.4 Option 4 is to publish and implement the Rough Sleeping Strategy and Action Plan which has been consulted upon. This option is the recommend option. It meets the requirements to publish a Rough Sleeping Strategy by MHCLG and its creation has taken in the views and comments of the public, key stakeholders and primarily the views of current and former rough sleepers. A partnership approach was used to develop the draft document and once agreed it will form the basis of co-ordinated and creative work across the city to eradicate rough sleeping in Coventry over the next 5 years.

3 Result of Consultation Undertaken

3.1 The development of the Draft Rough Sleeping Strategy and Action Plan was carried out in partnership with key external and internal stakeholders as well as ex-service users. The well attended discussions at the wider homelessness forum and workshop sessions that were held with key agencies directly working with and supporting rough sleepers, considered the citywide current position, what the collective vision was for rough sleeping with the actions and tools that would be needed to achieve the vision to end rough sleeping in Coventry.

3.2 Following approval by Councillor T Khan, Cabinet Member for Housing & Communities, on the 16th September 2019, a six week period of consultation was held between 18th September to 30th October 2019.

3.3 A key element of the consultation was to ensure alongside agency responses, that both the general public and current and former rough sleepers had the opportunity to feedback on the draft documents. Consultation was undertaken through the following channels and methods:

- The Let's Talk Engagement platform attracted 834 visits to the site and 108 responses/comments as well as 11 questions. Using the platform allowed us to effectively engage with the public and provided a space where people could contribute their thoughts and ideas as well as ask specific questions in relation to the strategy.
- Face to face engagement with 18 people with experience of rough sleeping. This was conducted over two days (16th and 17th October 2019) at The Salvation Army, Harnell Lifehouse and Steps for Change, City Arcade, Coventry. People with first-hand experience of rough sleeping were asked for their views under the three principles as above.
- Suggestion Boxes and thoughts-boards yielded, 14 responses, these were where anyone could leave a comment or thought about the draft Rough Sleeping Strategy, this facility was available at Steps for Change and Coventry Comfort Carers.

- Engagement with Coventry Homelessness Forum which is attended by key stakeholders supporting people who are homeless or at risk of homelessness on 6th September 2019.
- Via social media (twitter / Facebook).
- Direct invitations to comment from partner agencies.
- Internal circulation of the strategy to all CCC employers and departments.

Please see appendix C for full details of the consultation.

3.4 The key points raised through the consultation process included:

- To change the wording from Pillar to Principle.
- Formal development and subsequent recognition of the partnership to deliver the strategy and actions.
- That the vision is embedded and owned by all - One Coventry.
- Knowing how people can get help and give help.
- Enforcement should be used consistently and transparently.
- Language that is used should be positive and encouraging, not labelling and clinical.
- For those accessing services or rough sleeping only having to tell their story once.
- Specific reference to be made to Ex armed forces and Women with complex needs .

Principle 1 - To prevent new people from starting to sleep rough.

- Better universal, information, advice and guidance for people at risk of rough sleeping, professionals and the public.
- More accessible affordable housing options for single people especially those under 35.
- Early intervention through tailored appropriate support when someone is at risk of rough sleeping.
- A need for joined up services when people are leaving hospital or prison.
- Person led, not service led, interventions when someone is in crisis.

Principle 2 - To intervene rapidly when people start to sleep rough to help them off the street

- Better supply of affordable housing options.

- More appropriate and a wider choice of emergency/ temporary options for people.
- Information sharing between agencies - I only want to tell my story once.
- The right help needs to be available quickly with easy access points and delivered in a joined-up way.

Principle 3 - To promote a person's recovery once they are off the street to build positive lives and so they do not return to rough sleeping.

- On-going support.
- More understanding from people / professionals.
- Help to find employment and access benefits.

4. Timetable for implementing this decision

4.1 If the recommendations of this report are approved, the Rough Sleeping Strategy would be adopted and come into effect immediately.

5. Comments from Director of Finance and Corporate Services

5.1 Financial implications

The funding to resource the work set out in the Rough Sleeping Strategy is primarily grant funding and includes Housing First, Rapid Housing Pathway grant and Rough Sleepers initiative as included in the table below. In addition, we currently purchase support for rough sleepers as part of the overall homelessness support contract. We are in the process of recommissioning this contract with an expanded specification for rough sleeper support. This is within the existing overall financial envelope.

Table showing confirmed grant funding 19/20 - 22/23

Funding Stream	2019/20 £000	2020/21 £000	2021/22 £000	2022/23 £000	Total £000
Housing First	506	416	357	357	1,636
Rapid Housing Pathway	129				129
Rough Sleepers Initiative	190				190
Cold Weather Fund	45				45
Total	870	416	357	357	2,000

Alongside the funded provision, there are a number of third sector and voluntary services available in the City. Including, but not limited to, a Winter Night Shelter, Foodbanks, STEPS for Change, a multi-agency drop in service, community-based outreach and several services that provide information and advice through

charitable funding. The faith sector also offers information, support and guidance to people rough sleeping or inadequately housed.

The implementation of the strategy could have a financial impact on core funded housing and homelessness services within the city, due to the risk of increased activity in service and additional support to landlords to house rough sleepers. This should also be mitigated by the strategy through early universal advice to prevent people from sleeping rough, and through the revised specification for commissioned support service from April 20.

The grant funding position post March 20 is uncertain; however, a letter from the MHCLG in early November, confirmed the intention to continue to provide funding for the Rough Sleeping Initiative and Rapid Rehousing Pathway, where there is clear evidence of impact, demand and value-for-money. If further funding is not available to bid into, the existing deployment of resources for Housing and Homelessness would need to be reviewed to ensure the strategy remains deliverable.

5.2 Legal Implications

The Rough Sleeping Strategy and action plan, though independent documents, are intrinsically linked to the Council's Housing and Homelessness Strategy (2019-24). Under the Homelessness Act 2002, all housing authorities must have in place a homelessness strategy based on a review of all forms of homelessness within their district. The proposed Rough Sleeper Strategy further supports this duty and minimalises potential risk from legal challenge.

The Homelessness Reduction Act 2017 imposes upon local housing authorities "assessment" "prevention" and "relief" duties to those whom the authority is satisfied are eligible and either homeless or threatened with homelessness within 56 days.

These duties require authorities to provide personalised written housing assessments including agreed plans setting out the steps that the authority considers it and the applicant should reasonably take to secure accommodation for the applicant ("assessment"). Take reasonable steps to help an applicant threatened with homelessness to secure that their accommodation does not cease to be available ("prevention"). Take reasonable steps to secure that suitable accommodation becomes available (for at least 6 months) to a homeless applicant ("relief").

These duties apply to all those who are homeless or threatened with homelessness, irrespective of whether they have a priority need; and apply in addition to the existing duties to those who are in priority need.

In discharging its functions, the Council must also have due regard to the Public Sector Equality Duty in s149 Equality Act 2010. Please refer to 6.4 below.

6. Other implications

6.1 How will this contribute to the Council Plan (www.coventry.gov.uk/councilplan/)?

The introduction of a Rough Sleeper Strategy will contribute to meeting the priorities in the Corporate Plan, specifically;

- Locally Committed – protecting our most vulnerable people (including preventing homelessness and helping people who do become homeless).
- Locally Connected – Improve health and wellbeing
- Locally Connected – Reducing health inequalities.
- Globally Connected – reducing the impact of poverty
- Globally Connected – helping local into jobs

By working together as a partnership across the City with other organisations, community and faith groups the Rough Sleeping Strategy will enable rough sleepers to have alternative options than having to bed-down on the street. They will be known to organisations working with rough sleepers and services will be tailored to meet their needs in order to give opportunities to have access to affordable housing, appropriate health services, support given to maximise their finances and to access training and employment.

6.2 How is risk being managed?

There are no specific risks from the decision to adopt the Rough Sleeping Strategy 2019-24.

6.3 What is the impact on the organisation?

Officers will be expected to implement the final and agreed Rough Sleeping Strategy. The adoption of the new Rough Sleeping Strategy will ensure the council meets its statutory duty to publish its Rough Sleeping Strategy. It will also provide a formal platform to work with partners to eradicate rough sleeping and provide support to people who are currently rough sleeping or who are at risk of rough sleeping.

6.4 Equalities / EIA

Coventry City Council, Rough Sleeping Outreach Team report on the 29th October 2019, they have identified 62 who are presenting as rough sleeping. This is an increase from previous figures, but rough sleeping figures can only be a snap-shot at a period in time and can fluctuate. The majority were males; 92% were males and 8% were females. Of which, 56% were White British, 39% were White European, 3% Black British and 2% were Black African. Ages of our rough sleepers are 16-24yrs 5%, 25-44yrs 65%, 45-49 yrs 11%, 60-64yrs 0%, 65-74yrs 1%. There were 18% where we did not know their ages.

By having a shared partnership approach to strive to eradicate rough sleeping in Coventry by 2022, will improve the wellbeing and life chances of people with protected characteristics, who are homeless or at risk of being homeless, and it will, therefore, have a positive impact.

The results of the formal round of consultation did flag mental well-being impairment is a feature within the cohort of rough sleepers and those who have experienced rough sleeping, therefore it is important that strong effective links are made with appropriate agencies who support people to overcome.

- 6.5 Should the Council find any discrimination, harassment and victimisation during the consultation process the Council will seek solutions to help eliminate but also methods for advancing equality of opportunity and fostering good relations between people. These methods may include adaptations to the Rough Sleeper Strategy and Action Plan and/or inform working practices during and after implementation.
- 6.6 In the development of the Rough Sleeping Strategy the Council have had due regard to the public sector equality duty under s149 of the Equality Act 2010. An Equalities and Consultation Analysis (ECA) Part 1 was carried out during the development of the Draft Rough Sleeping 2019-24. This has now been updated for the Final Rough Sleeping Strategy following the public consultation (Part 2).

6.7 Implications for (or impact on) climate change and the environment

There are no know implications (or impact on) the environment from the adoption of the Rough Sleeping Strategy 2019-24.

6.8 Implications for partner organisations?

There are positive implications for partner organisations. The Rough Sleeping Strategy 2019-24 highlights the role of partner organisations and the importance of collaborative working. A number of the actions set out in the action plan will be delivered by partner organisations if they are best placed to deliver positive outcomes.

Report author(s):

Sophie Hall

Name and job title:

Housing and Homelessness Commissioning Manager

Directorate:

People

Tel and email contact:

Email: Sophie.hall@coventry.gov.uk

Tel: 07977018955

Enquiries should be directed to the above person.

Contributor/ approver name	Title	Directorate or organisation	Date doc sent out	Date response received or approved
Contributors:				
Jim Crawshaw	Head of Housing and Homelessness	People	01/11/2019	19/11/2019
John Toman	Rough Sleeper Co-ordinator	People	01/11/2019	10/11/2019
Paul Whitmore	Lead Accountant, Finance	Place	01/11/2019	19/11/2019
Michelle Salmon	Governance Services Officer	Place	19/11/2019	19/11/2019
Names of approvers for submission: (Officers and Members)				
Rachael Sugars	Finance Manager	Place	01/11/2019	19/11/2019
Mandeep Bajway	Regulatory Civil Lawyer, Legal Services	Place	01/11/2019	08/11/2019
David Ashmore	Director of Housing and Transformation	People	01/11/2019	19/11/2019
Gail Quinton	Deputy Chief Executive	People	19/11/2019	19/11/2019
Martin Reeves	Chief Executive	-	13/11/2019	13/11/2019
Councillor T Khan	Cabinet Member for Housing and Communities	-	31/10/2019	04/11/2019

This report is published on the council's website: www.coventry.gov.uk/councilmeetings