

Cabinet	
27 November 2024	
Report of: Julie Lorraine, Corporate Director for Resources	Classification: Unrestricted
Approval of the council's new Homelessness and Rough Sleeping Strategy 2024-2029 and supporting delivery plan	

Lead Member	Councillor Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development and Housebuilding
Originating Officer(s)	Karen Swift, Director of Housing & Una Bedford Senior Strategy and Policy Officer
Wards affected	All Wards
Key Decision?	Yes
Reason for Key Decision	Significant impact on wards
Forward Plan Notice Published	11/09/2024
Strategic Plan Priority / Outcome	Providing homes for the future

Executive Summary

The council as a local housing authority, is required by legislation, (the Homelessness Act (2002) and the Homelessness Reduction Act (2017)), to carry out a periodic review of homelessness in its District and to publish a homelessness and rough sleeping strategy based on the results at least every five years.

The current iteration of the council's Homelessness and Rough Sleeping Strategy was published on 21 December 2018 and has now reached the end of its life. In order to ensure that the council is compliant with this statutory duty, it is important that the council approves this latest version of the strategy.

Recommendations:

The Mayor and Cabinet are recommended to:

1. Approve the council's new Homelessness and Rough Sleeping Strategy 2024-2029 and the Delivery Plan which underpins the priorities of the new strategy.

2. To note the outcome of the consultation and how it has been used to shape the priorities of the new strategy.
3. To note the Equalities Impact Assessment as summarised in Section 4 of this report

1 REASONS FOR THE DECISIONS

- 1.1 The council as a local housing authority, is required by legislation, (the Homelessness Act (2002) and the Homelessness Reduction Act (2017)), to carry out a periodic review of homelessness in its District and to publish a homelessness strategy based on the results at least every five years.
- 1.2 The current iteration of the council's Homelessness and Rough Sleeping Strategy was published on 21 December 2018 and has now expired. In order to ensure that the council is compliant with this statutory duty, it is important that the council approves this latest version of the strategy and the delivery plan which sits underneath it.
- 1.3 Given that there have been significant changes in the local housing market, the pandemic, the cost-of-living crisis and financial uncertainty, the council is seeing an increasing number of approaches being made to its Housing Options Service for housing advice and homelessness assistance than ever before. It is necessary for the council to produce a new Homelessness and Rough Sleeping Strategy, which reflects the latest trends in homelessness, follows best practice and is compliant with current legislation.
- 1.4 In addition, this strategy reflects the council's commitment to focusing on improving outcomes for our residents. The council's Strategic Plan defines the council's vision for the future and identifies its goals and objectives.
- 1.5 Under **Priority 2: Homes for the future** – our ambition is that '**Everyone in Tower Hamlets lives in a good quality home that they can afford**'. The council's Strategic Plan sets out the council's commitment to '**Develop a strategy to House people experiencing homelessness (including, as a priority, to house rough sleepers)**'.
- 1.6 This strategy therefore reflects and sets out the council's priorities and commitment to focusing on improving outcomes for residents at risk of, or experiencing homelessness or rough sleeping in our borough, which is further underscored by the accompanying Delivery Plan with actions setting out how we will meet our new priorities.

2 ALTERNATIVE OPTIONS

- 2.1 "Doing nothing" would put the council at risk of legal challenge and would breach statutory requirements for developing and adopting a Homelessness and Rough Sleeping Strategy. This is because without a strategy in place, decisions taken that rely on the strategy could be open to challenge.

3 DETAILS OF THE REPORT

- 3.1 The council has a statutory duty under the Homelessness Act (2002) to conduct a review of the nature and extent of homelessness in its District (borough) every five years and to develop a strategy setting out:
- how services will be delivered in the future to tackle homelessness; and
 - the available resources to prevent and relieve homelessness.
- 3.2 Our most recent Homelessness and Rough Sleeping Strategy ended in December 2023 and this new strategy fulfils this statutory and mandatory requirement on the council in its role as a Local Housing Authority.
- 3.3 The review (see Appendix 1) was conducted as a desk top exercise using a sizable evidence base - drawn from data published by DLUHC (Department for Levelling Up, Housing and Communities), collated from the council's Housing Options Services, the Census 2021 data, and a variety of other sources. It is intended to be a snapshot in time using data which was available up to March 2023.
- 3.4 This data has been used to inform the council's new Homelessness and Rough Sleeping Strategy (2024 – 2029) which will provide the direction of travel for the council and its partners through the priorities identified via the review. These priorities will be used to guide the delivery plan for activities to reduce homelessness and rough sleeping in Tower Hamlets over the course of the next five years.
- 3.5 Our review and new strategy, (Appendices 1 and 4), have considered the national and regional policy context as well as the role that the government's welfare reforms have played in increasing homelessness. In addition, the review examines how rising housing costs - now exacerbated as a result of the current cost- of- living crisis – have contributed to the challenges that the council faces in delivering its support and services for those who are currently or at risk of homelessness.
- 3.6 The review also reflects on the impacts of the Homelessness Reduction Act (2017) and identifies some national policy uncertainties which could affect future levels of homelessness and responses to it. The review characterises those most affected by homelessness and rough sleeping, the main causes of both and how the council currently responds to homelessness and rough sleeping in the borough.
- 3.7 The review pinpointed a number of areas of focus for the Housing Options Service to enable officers to respond to the challenges ahead. These include:
- rising demand.
 - late approaches to the Housing Options Service (when people are actually homelessness, rather than when they are threatened with it).
 - reducing the number of new placements into temporary accommodation; and

- the need to do more to prevent homelessness at a much earlier stage.

3.8 The priorities which have been identified are set out below:

- 1. Working with people earlier to prevent them from becoming homeless and to reduce the use of Temporary Accommodation.**
- 2. Provide good quality accommodation for people who are at risk of, or where they become, homeless.**
- 3. Improve customer service and the individual's experience.**
- 4. Making sure that people have access to the right support services.**
- 5. To prevent rough sleeping but where it does occur, it's rare, brief and doesn't happen again.**
- 6. Boost staff resilience and well-being.**

3.9 Each of these priorities are accompanied by a number of associated high level action points to enable the priorities to be achieved, which have been developed further into activities within a delivery plan. The regular monitoring of this delivery plan will make it easier to update, in light of future changes in national, regional, and local policy and means we will be able to respond appropriately. Above all of the priorities is an accompanying and overarching priority of partnership working and an understanding that homelessness cannot be solved by the council or the Housing Options Service alone.

3.10 The delivery plan (Appendix 5) recognises the value of partnership working across the council and with statutory and voluntary agencies and was developed not only because of the new priorities and the review but following extensive consultation with residents and stakeholders.

3.11 Although a 6-week public consultation (Appendix 2) on the proposed priorities for the strategy was originally agreed, extra time was allocated to the consultation to account for the Easter and Eid period which occurred during the original consultation period. Therefore, the consultation opened on 4 March 2024 and closed on 26 April 2024 and ran for 8 weeks. During this period, all residents placed in Temporary Accommodation by the council were sent a paper version of the survey.

3.12 The consultation exercise consisted of an online survey via the council's online consultation platform 'Let's Talk' which sought to obtain the views of residents and stakeholders on the proposed priorities for the new Homelessness and Rough Sleeping Strategy. A summary of the council's review of homelessness and rough sleeping was included on the consultation page. Both the survey and summary of the review were translated into both Bengali and Somali which residents could access on the 'Let's Talk' platform.

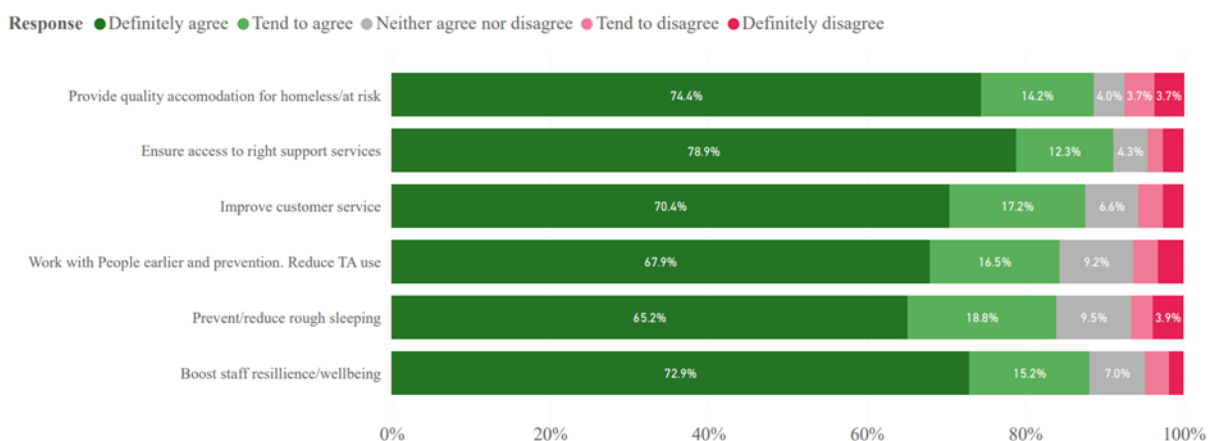
3.13 The council's Communications team promoted and publicised the consultation via its Facebook, Instagram, Twitter, Linked In and other social media channels. A press release was also issued, Members were informed via an all Members Briefing and staff encouraged to complete the survey via TH Now (the council's Internal News Bulletin) and through Housing Options staff service meetings.

- 3.14 In addition, paper copies of the survey were sent out in the post to circa 2,400 residents who the council has placed in temporary accommodation.
- 3.15 The Strategy and Policy Team actively canvassed residents at both the Residents Hub during the week commencing Monday 8 April through to Friday 12 April and attended the Mayor's Advice Surgeries encouraging and supporting residents to complete paper versions of the survey.
- 3.16 The Strategy and Policy team used their contacts widely and promoted the online survey through the London Councils Housing Directors Group, Tower Hamlets Homes Housing Partnership, Community and Voluntary Sector Groups, as well as ensuring that partners both internal and external to the council were invited to complete the survey online.
- 3.17 The council's Corporate Communications team promoted the link to the electronic version of the survey across all media channels to all residents.
- 3.18 In addition, the survey was promoted at the London Councils Housing Director Group – with the link to the electronic version of the survey shared. Similarly, all our contacts in the voluntary and third sector, Tower Hamlets Together Board, Tower Hamlets Housing Forum (THHF) and the councillors All Members briefing.
- 3.19 On the 10 March, the Housing Options Service hosted a stakeholder event inviting colleagues from other neighbouring local authorities, other service areas within the council who support and assist the boroughs residents who are or at risk of homelessness and rough sleeping along with agencies from the voluntary and third sector who also provide support to residents. A total of 35 delegates attended the day.
- 3.20 A further webinar was held on 17 April for residents with the Housing Options Management Team in attendance to discuss the review and development of the council's new priorities for homelessness and rough sleeping.
- 3.21 The consultation was also promoted in TH now – the weekly update for staff in the bulletin dated 11 April 2024.
- 3.22 A session was held on 24 April 2024 with over 100 members of staff within the Housing Options Service to gauge their responses to the proposed priorities, seeking their input into actions in the delivery plan accompanying the new strategy.
- 3.23 A further session was held with those experiencing rough sleeping on 1 May 2024 and through this informal discussion, opinion was gathered on the new priorities and the proposed activities to meet the priorities which the Service were looking at to inform the Delivery Plan.
- 3.24 A considerable volume of traffic was seen on the council's consultation platform 'Let's Talk' (a total of 1,043) during the consultation period, which demonstrates a high degree of awareness among residents and stakeholders.

3.25 Via 'Let's Talk,' 226 stakeholders completed the survey online with a further 133 providing a completed paper copy of the consultation (via the responses received from residents currently places in temporary accommodation who had been sent paper copies, and from the paper copies collected by the Strategy and Policy Team). **The total number of survey responses received was 359.** But adding together the traffic/number of visitors who viewed 'Let's Talk,' together with those who completed a paper version of the consultation survey, at least 1,269 stakeholders, including residents, had an awareness of the consultation and had engaged by viewing the survey and supporting documentation on 'Let's Talk'.

3.26 In comparison with other London Local Authorities who in the last two (post-pandemic) years have carried out consultation work on their new Homelessness and Rough Sleeping Strategies, this was a successful engagement exercise. London Borough of Barnet received 16 responses (16 April – 16 June 2023), City of London received 34 responses, (12 December 2022 – 12 March 2023) and more recently, the London Borough of Croydon received 188 responses (6th October to 15th December 2023)

3.27 The table below illustrates that among all respondents, across each of the six proposed priorities for the new strategy there is a high level of agreement.



3.28 A full analysis of the feedback received from the consultation exercise can be found in Appendix 2 of this report.

3.29 Further, the feedback received via the consultation exercise has demonstrated that the proposed priorities within the new strategy chime with residents and stakeholders. The comments received from residents and stakeholders have been taken into consideration by the Housing Options Service in the development of the Delivery Plan which accompanies the new strategy.

3.30 The feedback further reiterates the need (particularly with a new government and following the recent GLA/Mayor of London election) for the council to continue to lobby for changes to policy and regulation to tackle homelessness and rough sleeping, and to ensure that this is visible externally to stakeholders and residents. With our intentions evident as demonstrated by the new strategy

and delivery plan, there is no answer to homelessness that does not involve the government.

- 3.31 The timing of this new Homelessness and Rough Sleeping Strategy provides an opportunity to further support the ongoing Transformation Programme for the council's Housing Options Service. This year, the Service has received an additional £1.3m revenue and capital investment to move the Service to a single Housing Options ICT system to reduce the multiple IT applications and therefore remove duplication, which compounds delays in decision making.
- 3.32 In May, the Mayor in Cabinet approved the immediate release of an additional £1.93m for improvements to the Housing Options Service. These improvements will include creating thirty-four new roles with a sustainable funding source to meet the increasing demand and footfall and address backlogs, as well as extending the hours that residents can access a face-to-face service.
- 3.33 Oversight of the Homelessness and Rough Sleeping Strategy and its associated delivery plan will be provided by a Strategic Board which will be a multi-agency group - comprising of representatives from services internal and external to the council - who work with those who find themselves or who are at risk of homelessness and rough sleeping.
- 3.34 The Strategic Board will ensure that the delivery of this strategy is monitored and scrutinised, and that work is progressing as it should. A regular update will be provided to the Board alongside an update on key homelessness data to demonstrate the impact of our activity. The Strategy's actions will also be reviewed annually to ensure they are still relevant and appropriate with input from the Strategic Board.

4 EQUALITIES IMPLICATIONS

- 4.1 The council's new Homelessness and Rough Sleeping Strategy has been developed with a compelling evidence base and sets out how the council will work towards tackling homelessness and rough sleeping, enabling the council's officers to meet the challenges of homelessness and rough sleeping which derive from inequality of opportunity. The subsequent delivery plan outlines the activities which the council will undertake, and it will guide officers and assist them with supporting residents at risk of or who present as homeless or rough sleeping.
- 4.2 An Equalities Impact Assessment (Appendix 3) for the strategy has been completed and it is expected that strategy will have a positive impact on residents irrespective of any protected characteristics that they identify with. The review of homelessness and rough sleeping in Tower Hamlets identified that certain groups are more likely to be affected by the strategy as they are more likely to present themselves to the council as homeless, these groups include:
- Those aged between the ages of 18-44 years.

- Single persons without dependent children
- Households (including individuals) asked to leave by family and friends.
- Households that are threatened with homelessness when their private sector tenancy ends.

- 4.3 As a result of completing the EIA, it is evident that the priorities being taken forward within the strategy will not have a negative or detrimental impact on residents, irrespective of any protected characteristics under the Equality Act 2010 which they may identify with - both directly and indirectly.
- 4.4 The consultation exercise with residents and stakeholders has demonstrated that there is a strong consensus of agreement with all of the council's priorities to tackle homelessness and rough sleeping in Tower Hamlets - across all residents and stakeholders who identify with a particular or multiple protected characteristics with the majority of respondents to the consultation expressing that they definitely or tend to agree with all of the strategy's priorities.
- 4.5 Both the strategy and the supporting delivery plan will ensure that the council's statutory homelessness provision will become more accessible to all persons irrespective of any protected characteristics that they identify with. The activities which the Housing Options Service will take to support these priorities intend to ensure the delivery of targeted and appropriate support services as required. There are multiple actions within the delivery plan which intend to have a positive impact across all protected characteristics.
- 4.6 The strategy's focus on working earlier to prevent homelessness will therefore benefit all residents. While the strategy acknowledges that any household can become at risk of homelessness, those most vulnerable include a high proportion of households without social / family networks who can support them and who are more likely to have low or welfare-based incomes. The strategy will seek to tackle exclusions, improve accessibility and assessment, and enable individuals to achieve sustained outcomes that include improved health, wellbeing, and choices.
- 4.7 The proposed priorities and actions identified within the strategy are designed to address the needs of those who are disadvantaged, and all equality groups within the EIA are positively targeted with actions in the strategy's delivery plan which are designed to support and help them to maintain a home. The emphasis is on providing an accessible service and effective pathways to ensure sufficient advice and support is in place to support those who find themselves or at risk of homelessness or rough sleeping.

5 OTHER STATUTORY IMPLICATIONS

- 5.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,

- Consultations,
- Environmental (including air quality),
- Risk Management,
- Crime Reduction,
- Safeguarding.
- Data Protection / Privacy Impact Assessment.

5.2 No other statutory implications have been identified.

6 COMMENTS OF THE CHIEF FINANCE OFFICER

6.1 The Homelessness and Rough Sleeping Strategy 2024 - 2029 does not presently involve any additional costs, as its delivery will be funded within existing budgets, specific grants, and previously approved investment funding.

6.2 The delivery plan (Appendix 5) sets out six key priorities with actions to allow these priorities to be achieved. Finance will work closely with the Service and partners to identify where individual actions may require additional funding beyond current budget allocations, and as such further assessment of their financial impacts will be needed.

7 COMMENTS OF LEGAL SERVICES

7.1 The council is required by the Homelessness Act 2002 and the Homelessness Reduction Act 2017 to review homelessness in the borough and to publish a homelessness and rough sleeping strategy based on the results at least every five years.

7.2 In order to ensure that the council compliance with the statutory duty, the Mayor and Cabinet are requested to approve the latest version of the strategy.

7.3 Section 149 of the Equality Act 2010 requires the authority, in the exercise of its functions, to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the 2010 Act, to advance equality of opportunity between persons who share a relevant protected characteristic and those who do not, and to foster good relations between those who share a relevant protected characteristic and those who do not (the public sector equality duty (PSED)). The relevant protected characteristics are age; disability gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation. The duty must be complied with at the time that the decision under consideration is made and must be conducted with rigour and with an open mind. It is not, however, a duty to achieve a particular result and there will be decisions that do not give rise to any specific PSED issues. This decision appears to be neutral with respect to the PSED.

Linked Reports, Appendices and Background Documents

Linked Report

- NONE.

Appendices

- Appendix 1 – Review of Homelessness and Rough Sleeping in Tower Hamlets
- Appendix 2 – Consultation Report on the proposed Priorities for the council's
- Appendix 3 – Equality Impact Assessment
- Appendix 4 – Homelessness and Rough Sleeping Strategy 2024-2029
- Appendix 5 – Homelessness and Rough Sleeping Strategy Delivery Plan 2024/2025
- Appendix 6 – Homelessness and Rough Sleeping Strategy (Light Version) 2024- 2029

Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012

- NONE

Officer contact details for documents:

N/A