

# ROUGH SLEEPING STRATEGY

2017-2022



City of Westminster

City  
for  
All

# Cabinet Member Foreword

Rough sleeping is the most visible and personally damaging form of homelessness. It is something that a leading global city simply cannot ignore. We believe that, with the right support, it is possible for everyone sleeping rough to turn their lives around, even when they face multiple and deep-seated problems, such as mental illness or addiction.

The stark fact is that rough sleeping is harmful and dangerous, and the longer someone stays on the streets, the more harmful and dangerous it becomes for them. The best thing we can do is to prevent rough sleeping in the first place. Where this is not possible, people must be supported away from the streets as soon as they can be, before things deteriorate, and given help to resolve the problems that put them there in the first place.

Rough sleeping and behaviours that are often associated with it, such as begging, drug activity and anti-social behaviour, street fouling and low-level intimidation, are cause for concern amongst the residents, workers, businesses, visitors and communities we serve. Although it is not illegal to sleep rough, these activities have an unacceptable and detrimental impact on communities and place further demands on local public services, which are felt more acutely in Westminster than anywhere else in the country.

For all these reasons, reducing rough sleeping and its impacts on communities remains an absolute priority for Westminster City Council, even though the vast majority of rough sleepers have no prior connection to the city. Our focus is to offer people ways off the streets that ensure they do not return and to reduce the impact rough sleeping can have on all Westminster's people and places. Westminster currently spends a total of £6 million a year on outreach services and accommodation for rough sleepers, alongside wider investment, which includes a planned new, state of the art assessment centre

Our last rough sleeping strategy covered the period 2013-2016. Over this time we worked closely with our partners to deliver lasting achievements and meaningful improvements to the lives of rough sleepers, such as 99% registration of those in accommodation with GP services. We also moved on 150 former rough sleepers to more independent

accommodation during 2016 alone.

The number of people rough sleeping across the country has increased in recent years and, despite our successes locally, remains consistently high in Westminster. One of the biggest changes since our last strategy was launched has been the significant increase in non-UK/Irish nationals sleeping rough here.

It is clear that there are a large number of often complex and interdependent factors that contribute to the number of people rough sleeping at any one time. This strategy sets out how the council intends to respond to these challenges over the next five years (2017-2022). It builds on our achievements and sets out how we will continue to improve what we do to prevent and tackle rough sleeping. Running through this document is the importance of the council's leadership role in bringing together all those with a part to play in Westminster. As important, we will be using our track record of innovation to support action with other London boroughs, the Mayor and, in some cases, other cities across the UK. We will be at the forefront of exploring new approaches like Housing First.

But we cannot do this alone. We must work closely with our partners and the public as a whole to develop, coordinate and implement solutions that are focussed at getting people off the streets. This is an issue that many people care about deeply and there are ways to genuinely help our efforts, for example, by referring rough sleepers to streetlink.org.uk. This strategy is intended to help catalyse the kind of cross-community action which is vital to realising the outcome we all want to see – an end to rough sleeping and the harm it brings to those caught up in it.



**Councillor Antonia Cox,**  
Cabinet Member for Public  
Protection and Licensing



**Councillor Rachael  
Robathan,** Cabinet  
Member for Housing

## This document

This document starts by giving a snapshot of the rough sleeping issue in Westminster. It goes on to explain what we want to achieve over the life of this strategy and identifies three key priorities. It sets out the approach we intend to take in meeting these priorities. A detailed action plan outlines specific actions we will take.

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# The current picture of rough sleeping in Westminster

## What is rough sleeping and what does this strategy seek to address?

In this strategy, “rough sleeping” is used to refer to people who are sleeping or bedding down in the open air; in places such as streets, doorways, parks, benches or bus shelters; or even in sheds, car parks or tents. While rough sleeping is far from the only form of homelessness, it is the most visible and striking manifestation.

This strategy also covers former rough sleepers who are currently in our supported accommodation, being helped to stay off the streets and rebuild their lives.

We do not assume that rough sleepers are always connected with anti-social behaviour, or that they engage in criminality such as begging. A large number of people seen begging, engaging in anti-social behaviour or crime on Westminster’s streets during the day-time are not rough sleepers and a different response is required to tackle such problems effectively.

This strategy does not therefore provide a definitive strategic approach to tackling street-based anti-social or criminal behaviour, including begging, and we will address such issues separately. The strategy does, however, make clear that we will protect communities from the negative impacts that are associated with rough sleeping, whilst retaining a focus on helping the rough sleeper to get off the streets. Low level intimidation and street fouling are negative impacts people have told us they are concerned about.

This document uses a number of technical terms which are defined in a full glossary at the end.



## The scale and location of rough sleeping in Westminster

Rough sleeping is a growing problem nationally, but is particularly acute in Westminster, which has by far the highest number of rough sleepers in the country. The reasons for this are explored in more detail below.

To help us monitor the issue and enable us to plan our response, we use the Combined Homelessness and Information Network (CHAIN), the multi-agency database recording information about rough sleepers in London. We also undertake quarterly street counts to get an accurate snapshot of who is rough sleeping in Westminster on a given night.

According to CHAIN, 2,857 people were seen rough sleeping in Westminster during 2015-16. This is 35% of all rough sleepers in London and more than the next seven ranking boroughs combined<sup>1</sup>. CHAIN is also able to tell us that the most of those rough sleepers are new to the street (1,689 in 2015-16). While we help the majority of these off the streets on night one, our street counts suggest that there are around 260 people sleeping rough on Westminster’s streets on any given night. This is because we also have a high number of ‘returners’, who have slept rough in the past, received support and unfortunately found themselves back on the street, in addition to a core of long-term entrenched individuals.

We know, both from experience and available data, that we experience ‘hotspots’ in the city which can change but have broadly remained the same in recent years. The exact combination of reasons why an area becomes a ‘hotspot’ is complex and difficult to predict but factors such as availability of services, relatively safe and dry areas to sleep, presence of existing rough sleepers and access to drug markets tend to coalesce to create a hotspot. In recent years the most notable hotspots in Westminster have been Victoria, Marble Arch, the Strand and Piccadilly.

Rough sleepers currently cost public services a disproportionate amount, due to the complexity of issues they face and their use of public services in an unplanned way. An entrenched rough sleeper has been estimated to cost the public an average of £16,000 per year<sup>2</sup> through demands placed on public services (compared to £4,600 for the average adult). The current pressures on finances across all partners mean it is vital that we work together to reduce these costs.

<sup>1</sup> Camden 641; Lambeth 445; City of London; 440; Tower Hamlets 395; Southwark 372; Ealing 287; 444Newham 260

<sup>2</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/417230/150325\\_Addressing\\_Complex\\_Needs\\_-\\_final\\_publication\\_amended.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417230/150325_Addressing_Complex_Needs_-_final_publication_amended.pdf)

# Why do people sleep rough in Westminster?

The range of complex causes of rough sleeping in Westminster has increased significantly since we published our last strategy. It is therefore important that we remain aware of and focused on the reasons why Westminster sees high numbers of rough sleepers if we are to do anything meaningful about this situation.

The intelligence we gather through our daily interactions with those who sleep - or have slept - on Westminster's streets gives us a deep insight into why people find themselves in this unfortunate and dangerous situation. Similar to the reasons behind the existence of hotspots, the reasons listed below are neither comprehensive, nor mutually exclusive. In practice they often combine and interact to create a 'perfect storm' for an individual which leads them to sleep on Westminster's streets.

- **Westminster is the 'capital of the capital'.** Our unique location is undoubtedly part of the draw for rough sleepers from across the country and beyond the UK. Westminster is the heart of the capital city and the centre of the UK's transport network (including being the home of Victoria Coach Station) and this prominence and accessibility combine to make Westminster an obvious choice for rough sleepers. Furthermore Westminster is a busy, global city which brings together businesses and visitors from all over London, the UK and the rest of the world, to an extent simply not seen anywhere else in the country and comparable only with the centre of other global cities. This scale and breadth of activity can be part of the attraction for rough sleepers who seek, and benefit from, the relative safety offered by central London, as well as the range of employment and other opportunities here. Similarly, rough sleepers may be drawn here by the prospect of access to drugs or criminal activity, including begging, particularly because certain communities may feel inclined by their values and beliefs to give generously.
- **Availability of services.** Westminster City Council prides itself on the support we offer to those most in need. We are committed to ensuring services are available for all those who need and are entitled to support. Much of the funding we receive from central government to deliver rough sleeping services recognises the scale of the challenge we deal with on behalf of the entire country. It is however, important to understand that the existence and availability of services (including those not commissioned or linked at all to the council) can themselves draw people to the city in search of support. This is a challenge for Westminster, especially where the extent of our service offer is misunderstood by service users and workers in other boroughs.
- **People have highly complex personal situations and support needs.** 'Traditional' rough sleepers often have complex support needs and entrenched problems such as substance misuse and mental or physical health issues (and, in many cases, complex combinations of these) which contribute to the reasons why they are on the street in the first place and also cause them to stay on the streets. As noted above, it is also important to note that the increased access to and lower price of drugs in the centre of London is likely to appeal to those with substance misuse issues, thus compounding the problem.
- **People can be unable or unwilling to secure accommodation.** There are a number of people who tend not to have the same kind of complex support needs as those described above, but do not access accommodation for other reasons. Often people find themselves in this situation because their immigration status means that they have No Recourse to Public Funds so cannot claim Housing Benefit. Whilst such individuals may work in informal or low paid jobs, the money earned may well be sent to relatives in other countries rather than used to pay for accommodation in the UK. This poses a long-term risk that such individuals get drawn into more dangerous behaviours whilst sleeping on the streets, such as taking drugs, which can lead to long-term entrenchment.

- **Non-UK/Irish (I) Nationals.** Since November 2014, the number of non-UK/I nationals generally exceeded that of UK/I nationals<sup>3</sup> in every street count we undertook, making up around 65% of rough sleepers in Westminster on any given night. This trend was broken for the first time in two years during our November 2016 street count where only 35% of rough sleepers were identified as non UK/I nationals. We are yet to fully understand the reasons behind this statistic, or whether it marks a lasting change, although we believe our concerted action in partnership with the Home Office has made an impact. It is therefore important that we continue to monitor these numbers to identify if a new long-term trend is emerging.

Non-UK/I nationals sleeping rough in Westminster raise distinctive issues that mean we have to respond in different ways. Evidence shows us that many tend to sleep rough for different reasons to rough sleepers from the UK or Ireland and generally have much lower levels of support needs. Many individuals actively refuse any offers of support away from the streets and are often sleeping rough in London temporarily while seeking (frequently informal) work.

As noted above, a large proportion of this group are not entitled to housing benefit or have "No Recourse to Public Funds" status which limits their access to supported accommodation.

This situation raises challenging issues. We are clear that Westminster's streets are not an appropriate accommodation option for people who come here without a realistic plan for where they are going to sleep. Choosing to sleep on the streets, in order to maximise earnings to be sent back to other countries, is not a legitimate choice. This is because of the dangers rough sleep poses to the individuals themselves and the risk that they will be drawn into anti-social behaviour or crime.

We make every effort to ensure that support is available to non-UK/I nationals who are vulnerable and require an intervention. For those who require support, we have a tailored approach and work in partnership with services such as Routes Home (a service provided by the Greater London Authority (GLA) to support non-UK/I nationals sleeping rough). For those who don't require support and who are abusing EU free movement rights or immigration law, we will continue to work in partnership with the Home Office Immigration Enforcement (HOIE) to reconnect them to their home country.

We do not know what effect the result of the recent referendum on the UK's continued membership of the EU might have on this situation. In particular, we do not know what the future rules will be regarding the movement of EU nationals. Whatever the final outcome, there are limits to what a local authority can realistically do to help many non-UK/I nationals who choose to sleep rough here.

- **Rough sleeper health.** Rough sleepers have higher rates of physical and mental health problems than the general population. Some aspects of poor health are attributable to, and exacerbated by, sleeping rough. Some also play a role in an individual becoming homeless in the first place.

National research identifies common health needs of homeless people – substance misuse, mental ill-health and dual diagnoses that cover both mental illness and substance misuse. This is supported by the self-assessments of former rough sleepers in our accommodation services and evidence from our Joint Strategic Needs Assessment of Rough Sleepers Health and Healthcare carried out in 2013<sup>4</sup>.

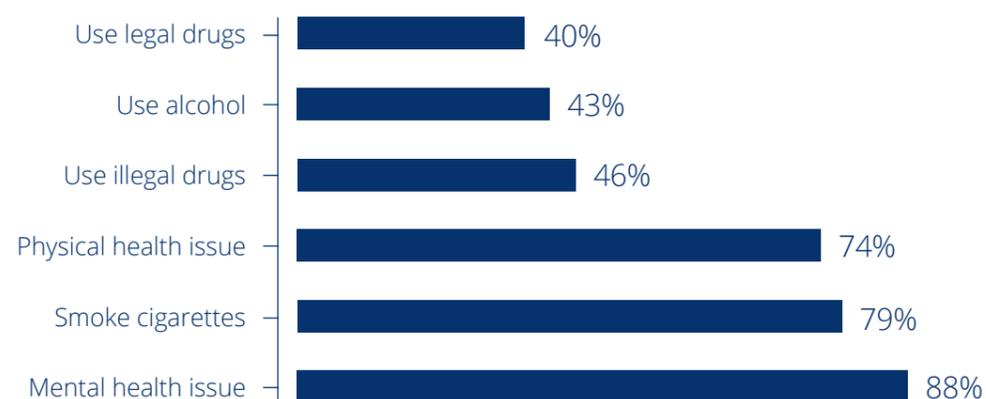
When homeless people do access health services, they are likely to do so in an unplanned way (for example through hospital accident and emergency services) and to be in a state of chronic ill health, often because of a reluctance to access primary or community care before things deteriorate. This results in longer stays in hospital and multiple readmissions, and has clear cost implications for the NHS.

<sup>3</sup> Irish nationals have a special status in UK law, which affects their rights across a number of areas, including eligibility for British citizenship and certain welfare benefits. As a result, they have more advantageous rights than other EU/EEA nationals in some areas. See *House of Commons Library*.

<sup>4</sup> <http://www.jsna.info/document/rough-sleepers>

Our new health assessment tool introduced in our accommodation services shows that last year, 88% of those helped identified themselves as having a mental health support need. We need to work closely with partners to address this effectively and our target over the period of the strategy is to increase the percentage of people in our accommodation services with a mental health need who are engaging with mental health services from 64% to 80%. Some of the key challenges are due to the complexity of issues that can be involved – many rough sleepers suffer from problems which may not fit into defined categories of mental illness or do not meet the statutory threshold for intervention.

#### Self-identified health needs of people in our accommodation services (2015/16)



Source: 2015/16 Common Health Assessment Tool (CHAT) completed by 268 service users within the rough sleeping pathway

Many rough sleepers have a dual-diagnosis – that is they suffer from mental health problems as well as being alcohol – or drug- dependent – which can affect their access to mental health services whilst they misuse substances.

There have also been sharp increases in the use of ‘novel psychoactive substances’ (NPS), formerly known as ‘legal highs’, including amongst people who are rough sleeping. These substances are synthetically produced and are designed to mimic the effects of other drugs such as ecstasy or cannabis and other hallucinogens; but are often cheaper and more readily available than other drugs. We understand these substances vary from packet to packet and the effect that they can have on people has been extremely severe. The withdrawal from the drug is often very hard to control and can be very painful. We have had reports of psychotic episodes, severe stomach cramps and individuals falling unconscious soon after ingesting an NPS. Individuals can often also become violent to members of the public or even outreach staff offering support, suggesting a wider threat to community safety. The recently enacted Psychoactive Substances Act 2016 bans the production, supply and importation of these substances. We welcome the recent classification of Spice, formerly considered an NPS, as a Class B drug, although we are calling on the government to upgrade this to Class A due to the nature of the drug and issues it is causing.

All these issues often have a major bearing on the services we provide – particularly for those rough sleepers who get stuck in a ‘revolving door’ of rough sleeping. These are often service users who move in and out of services because they abandon their placement or are evicted after serious or consistent anti-social behaviour. On average, we estimate that there is an eviction or abandonment of this kind in services every week.

While it is unacceptable for someone to keep accommodation where they are putting others at a significant risk of harm, we recognise that dealing with the issue by eviction may simply move the problem elsewhere – either to another hostel or back onto the streets.

Research suggests that an underlying and pre-existing mental health problem is a significant factor which often contributes both to rough sleeping in general and also to these kinds of behaviours in particular. This includes significant emotional and psychological disorders (such as complex trauma and personality disorders), often exhibited through behaviours indicating underlying difficulties with relationships or managing emotions, and which can be ‘self-medicated’ by substance misuse, self-harm, anti-social behaviour or crime. These are many of the same behaviours we experience in our services and in particular, where people revolve in and out of services. We particularly want to tackle this ‘revolving door’ issue, which is unproductive for all those involved and an ineffective use of resources.

## What we want to achieve

Our overarching ambition is to deliver a significant reduction in rough sleeping and address the harm it brings to individuals and communities in Westminster.

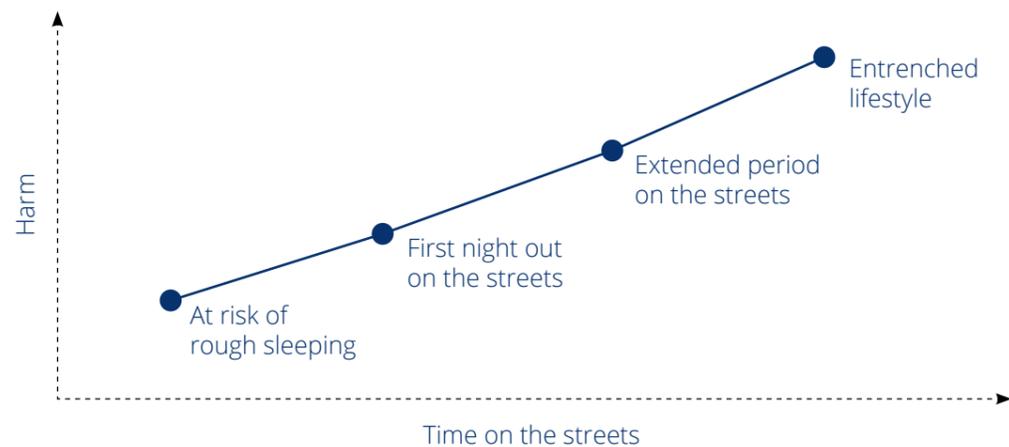
Experience shows us that with the right solutions and bold actions, rough sleeping is not inevitable. It also shows the need to recognise that many of the factors driving rough sleeping are entrenched, enduring and are unlikely to be fully resolved before the end of this strategy in 2022. That said, as this strategy explains, there is much we can do to reduce rough sleeping and its impacts, working with others to identify and tackle some of the underlying causes.

Measuring our success in realising these ambitions in a meaningful and fair manner is particularly difficult. We feel it would be misleading to set overall targets for reducing the number of people rough sleeping in Westminster as we have only limited influence over many of the factors behind this. Whilst there is a lot of data available and we could set targets which relate to specific areas of activity, there is a risk that such targets could only be achieved at the expense of wider goals and we feel it is important to remain focused on the big prize of a significant and sustainable reduction of people rough sleeping in Westminster.

# Our priorities

Rough sleeping is harmful and dangerous for the person sleeping on the streets, and the longer someone stays on the streets, the more harmful and dangerous it gets both for the individual and the wider community (see figure 1). We must however, also acknowledge that rough sleeping is not illegal nor is it, in and of itself, fundamentally anti-social.

Figure 1 - Rough sleepers' experience



Within this context, our primary focus is to help stop the individual from escalating up the harm scale, intervening as early as possible to stop dangerous behavioural patterns developing and combining. We are clear that rough sleeping must be tackled in a sustainable manner that does not simply move problems around the city. We take this approach in order to protect both individual rough sleepers and Westminster's resident and business communities from harm.

Our strategic approach is, therefore, based around three priorities which we believe will help deliver our ambition. These priorities broadly follow the chronological journey experienced by individuals who find themselves sleeping on Westminster's streets.

**Priority a) Where it is possible for us to do so, prevent people from rough sleeping in the first place.**

The best policy on rough sleeping is to stop it from happening in the first place. Wherever possible, we will take action to prevent homelessness and rough sleeping from happening in the first place. Our aim here is to decrease the flow of new people to Westminster's streets. Although the council cannot prevent all rough sleeping, we do know there is more that can be done to support groups of people where we have the ability to intervene at an earlier stage.

Most people who sleep rough in Westminster do not, however, have any local links here at all. Our most recent data suggests that a very small minority of new rough sleepers on Westminster's streets had their last settled base here. This means there are limits to what the council can realistically do to prevent everyone from rough sleeping here from the outset. In order to address the wider issue of Westminster being seen as 'the place to go to sleep rough', we also have to make it clear that we do not consider sleeping rough in Westminster to be an acceptable situation for people, as it is dangerous and can lead to long-term harm.

**Priority b) When people do end up on the streets, provide a rapid response, support people to rebuild their lives and stay off the streets for good.**

Inevitably, it will not be possible to prevent everyone ending up on the streets. We therefore remain committed to the Mayor's aim that no-one who does arrive new to the streets of London should spend a second night out. The Mayor's No Second Night Out service provides a rapid response for those who find themselves rough sleeping for the first time in London. We know that this approach is working and preventing people from returning to the streets. In 2015-16, over half of the people seen sleeping rough in Westminster who were new to the streets did not spend a second night out.

Where we can't help rough sleepers off the streets on night one, or they refuse our support, the reason usually arises from their complex support needs and their housing status is actually not the root of the problem. We need to understand and tackle these more fundamental problems in people's lives, such as alcohol and drug abuse, mental and physical health issues or other social problems. Indeed it is often a complex and inter-locking combination of a number of these factors rather than a single problem to overcome.

We need to work in partnership to help people address the often complicated underlying issues in their lives. Most of these will only be worsened by sleeping rough; tackling them will often require very specialist tailored support provided over a long period of time. This is what many of our specialist services aim to address. Over the life of this strategy we want to work more closely with agencies across the city to support our objectives in this strategy and help people rebuild their lives.

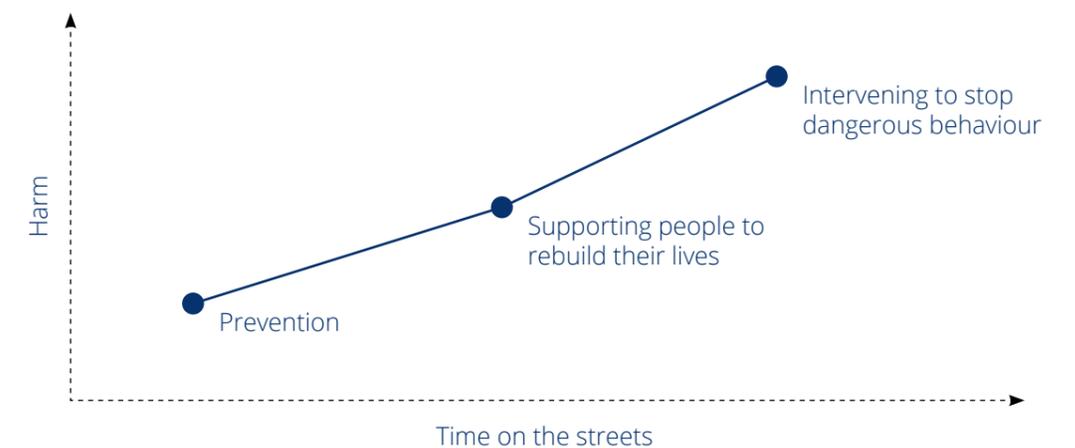
**Priority c) Protecting communities from anti-social behaviour associated with rough sleeping and intervening to stop dangerous behaviour.**

The reasons for an individual being on the streets are often extremely complex and can be intertwined with other anti-social behaviour and activities.

Our experience is that enforcement action which follows, and is linked to, offers of support can often actually help the individuals concerned and drastically reduce the negative impacts on the city as a whole. This personalised approach will require a more joined up approach to intelligence-led action, taking a wide range of information into account when deciding whether or not to enforce and the type of action that should be taken. In most cases this should start with the assessment made of an individual's needs and situation at the start of their rough sleeping. We know that to deliver this priority, a close and positive partnership with the police is critically important and we are committed to working closely with them to deliver our objectives.

This approach is based on the insight that runs throughout this strategy - that rough sleeping is damaging and dangerous for the individual and for the community as a whole and that we may need to take the difficult decision to take enforcement action against anti-social behaviour in the interests of all concerned.

Figure 2 - Our response



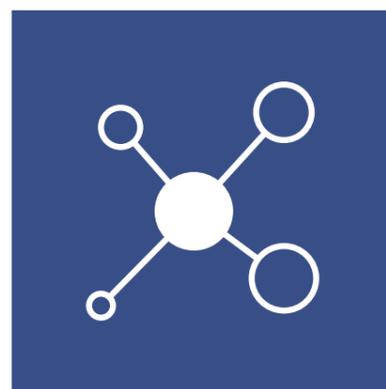
# How we are going to deliver

## Principles.

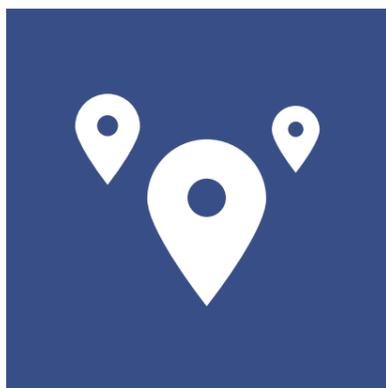
Our approach to meeting these priorities will be underpinned by our core principles which we feel are important to share to provide the public, partners and stakeholders with clarity on how we intend to go about delivering our priorities.



Innovation and making the most of the resources we have.



Westminster provides strategic leadership for the city.



Partnership working and everyone playing a role.



There is a sustainable route away from the street for everyone.

**Innovation and making the most of the resources we have.** The overall funding and resourcing picture is complex. The Council continues to dedicate resources and real-term investment, in order to tackle the problem head on and provide basic rough sleeping services, such as outreach and accommodation. However, we also commit City Management, Public Health and wider preventative homelessness/housing services to address the issues we face. It is important to be honest about the scale and complexity of this investment but it is also important to recognise the financial challenges facing public bodies and how we can respond to these. As the funding pressures on local authorities continue, we will need to make the resources we do have stretch much further than they have in the past. This means being more innovative about how we deliver against our priorities and help people rebuild their lives.

Our services are already sector leading, but we want our future offer to be even more focused on outcomes and added value for rough sleepers. We've already seen successful changes to service commissioning and delivery and we want build on these. For example, in 2014 we introduced a payment by results element to our outreach services contracts which has raised the bar in performance and encouraged an outcomes-focused approach. Going forward, we will consider extending payment by results where this makes sense to help focus provision around outcomes and add value for rough sleepers; to stimulate innovation; and to encourage efficiency and value for money. We also want to combine such approaches in how we operate and what we seek from our partners to increase the tangible impacts we can make to homeless individuals.

To deliver a more outcome focused approach, we will also require the support of partners from other agencies to share information and data so we can make sure we are measuring performance accurately and reducing duplication of interventions from services.

**Westminster provides strategic leadership for the city.** The financial challenge facing the council also sets the context for changes in our role, away from being a majority funder of services and towards a strategic leadership role based on relationships, influence and leverage. Our vision is clear and, throughout this strategy, we set out the actions and approaches that we feel are necessary to realise the ambitions we hold for rough sleeping in Westminster. Such actions will not always be within the gift or the responsibility of the council, but we are committed to working with those who may be better placed to deliver and encouraging all partners to identify how their organisation can contribute to the ambitions and principles set out in this strategy.

Rough sleeping does not respect borough boundaries. Sometimes tackling our problems will require London-wide (and in some cases UK-wide) action. There is already some highly effective joint working across London boroughs and the Mayor on this issue, but this could go further. As part of our leadership role, we will make clear where there needs to be a more joined-up response to rough sleeping and greater partnership working across London and the rest of the country and suggest solutions that others can take to help resolve the problem sustainably.

We will also improve how we access other funding streams that may be available across the city which can support our objectives and we will invite companies and philanthropic donors to get involved in this strategy as part of our developing social value strategy. This will also involve identifying how businesses who supply us with services can be part of action to address some of these issues.

**Partnership working and everyone playing a role.** At a local level, where we cannot deliver something directly, or where services are more effectively delivered by others, we want to work with partners across the public, private and voluntary and community sectors, and with the general public. This will enable us to rise to Westminster's challenges, developing new solutions to make the best use of resources and deliver effectively on shared objectives. In order to maintain oversight and coordinate action related to this strategy, we will establish a dedicated rough sleeping board to function cross-council and cross-partner.

We know that the businesses and the public are rightly concerned about rough sleeping and are keen to help people away from the streets. We are ready to advise businesses, the

public and charities on how to make a real change to the lives of rough sleepers should they wish to do so. We will provide information they need to help them make informed decisions about how they can make a real difference, including through volunteering. We make it easy for people to find opportunities to volunteer to help rough sleepers in the city through our volunteering website Team Westminster<sup>5</sup>. We also run a Time Credits scheme to recognise and reward people's voluntary efforts.

There are a number of groups and businesses in Westminster responding to the issue through the distribution of food and drink through soup runs or other on-street donations of tents, sleeping bags and clothing.

Whilst these may be well-meaning actions and are intended to meet peoples' immediate needs, they also have the unintended consequence of helping to maintain a street lifestyle for some people and counteract the more tailored approach intended to meet peoples' long-term needs that underpins this strategy. In some cases these kinds of services can draw in others who are not rough sleeping or who could access more sustainable support elsewhere. This in turn can exacerbate anti-social behaviour and other problems on the street around the service. However, we also understand that some organisations will continue to run such services despite our concerns and there are limited options for the council to stop this.

We will work with the voluntary sector to explore other new ways in which all services can provide a more consistent, effective tailored and co-ordinated response, and will consider a quality mark in which providers can work to raise the quality of their service.

**There is a sustainable route away from the street for everyone.** We are absolutely clear that anyone who finds themselves at risk, or on the streets of, Westminster can turn their life around and our focus is on helping people to move away from the streets for good.

This will not always be straightforward and will only work with positive cooperation and engagement from the individual concerned. However, experience shows that, with the right intentions, actions and support people can get off – and stay off – the streets. Where possible, this may involve helping to address underlying issues in people's lives such as substance misuse, but equally it may involve reconnecting people with social support networks and high quality services that they have left behind to come to Westminster.

This approach will be personalised, a concept which is explored in more detail below, but we will always work towards the most sustainable solution for the individual and the city as a whole.

# Achievements in delivering the 2013 - 2016 Rough Sleeping Strategy

- We reviewed our supported accommodation services to better target provision and enhance joint working. All services now specialise in working with different groups of rough sleepers and a new specialist supported accommodation scheme has been opened for older men with complex needs.
- Our outreach teams, who support people to find routes away from the streets, now focus on particular groups of rough sleepers who have very different types of needs, rather than working on an area-by-area basis.
- We introduced an innovative 'payment-by-results' element to our outreach contracts which has raised the bar in performance.
- We have had huge successes in improving health outcomes for rough sleepers. A Homeless Health Coordination Project (HHCP) was launched which supports 19 accommodation services across Westminster to improve health access and decrease health inequalities of rough sleepers. This has had a big impact - 99% of rough sleepers in our accommodation services are now registered with a GP.
- We introduced a new hotspot team to deal with areas of the city experiencing particular problems with groups of rough sleepers. Staff across Westminster received training on how to use new tools and powers to deal with anti-social behaviour.
- There has been closer working with the Metropolitan Police and Home Office to help reduce rough sleeping by European Economic Area (EEA) nationals. We worked closely with partners to develop and pilot a new operational response to the issue.
- An innovation fund was introduced to drive innovation and new ideas in the sector – more than five projects have been awarded funding so far, including Westminster Homeless Action Together (WHAT) week.
- We supported the Westminster Homeless Action Together (WHAT) week in July 2016 which secured the help of over 300 volunteers to gather more information about our street homeless population to find out what could make a difference to their lives.

<sup>5</sup> <https://do-it.westminster.gov.uk>

# Action plan

**Priority a** – Where it is possible for us to do so, prevent people from rough sleeping in the first place.

## Our objective

Fewer new people find themselves sleeping on Westminster's streets.

## Overview

As noted elsewhere in this strategy, the vast majority of those who sleep on Westminster's streets have not previously had any connection to Westminster.

He recently passed Homelessness Reduction Act requires local authorities to work with everyone at risk of homelessness (i.e. including single people that are not currently considered to be in 'priority need' under previous legislation) and to develop an action plan to avoid homelessness.

Whilst the direct implications of these new duties for Westminster will be mixed, from a rough sleeping point of view, it may be that this encourages other local authorities to act earlier to support people to secure appropriate long-term accommodation where they live, thus avoiding the push to travel to Westminster and sleep rough.

Although there is not a simple link between statutory homelessness and rough sleeping in Westminster's context, it is also important to note that the council recently published new policies on homelessness. The aim of these policies is that people will spend less time in unsettled temporary accommodation and will instead receive a quicker, more settled offer of housing, with support where appropriate.

## Our approach

Our Housing Options Service has a strong and effective approach prioritising the prevention of homelessness. This helps a broad range of people in Westminster potentially facing the loss of their home, including providing advice and assistance, family mediation services, landlord negotiation and helping people find private sector accommodation. It is important to recognise the pressures on accommodation in Westminster as there is significant demand for housing in the borough and affordable housing in particular, and we need to manage people's expectations. These issues are explained in more detail in our housing strategy direction of travel statement.

Many single vulnerable people in the city who are at

risk of homelessness or rough sleeping may need specialist, enhanced support to get back on track. We are already piloting a new programme to provide enhanced support to single vulnerable people with recognised local links and identified by council services as being at risk of homelessness or rough sleeping. People are assessed and offered individual plans to help them tackle the problems that put them at risk of homelessness and to put them on a sustainable path to independence. The type of support in each case will depend on the individual's needs, whether helping them make informed choices about their housing options; securing an immediate place to stay; providing help with getting and staying in work; or other support needs such as mental health.

We also work in partnership with embassies and voluntary sector organisations in other countries whose nationals make up high numbers of rough sleepers in Westminster to undertake preventative work.

## Our new commitments

- We will learn from our on-going pilot and use this to shape a new specialist, frontline service for single vulnerable people at risk of rough sleeping with recognised local links to Westminster as part of our re-designed housing options service.
- We will lobby the Mayor and the government to ensure that other areas are supported to stop people from coming to Westminster in the first place and getting the help they need closer to home.

## Our objective

People who are released from prison, discharged from hospital or other institutional settings do not end up on the streets.

## Overview

We know that people who have experienced some kind of institutional setting – such as prison, care or the armed forces – are one of the groups at most risk of ending up sleeping on the street. In 2015-16, 32% of rough sleepers in the city had previously been in prison. Some 25% of those identified as being at high risk of re-offending in Westminster are also listed on the rough sleeping database. This highlights the importance of joint working across sectors to help people at particularly high risk of rough sleeping.

Leaving prison or hospital can be one of the triggers that lead people directly to the streets. In too many cases, opportunities to prevent rough sleeping are not always being taken. We know there is more work we can do to address this with partners in the city and will develop a multi-agency approach over the course of the strategy to tackle it.

## Our approach

In partnership with probation services, including the London Community Rehabilitation Company (CRC), our reducing re-offending services work to ensure that offenders are not in a situation where they have to sleep rough upon release from prison. This includes action to save tenancies, resume housing benefit and secure a suitable address.

We work with the Central London Clinical Commissioning Group on specialist discharge protocols for hospital patients who may be at risk or have a history of rough sleeping.

## Our new commitments

- We will draw on the learning from the No First Night Out pilots in other London boroughs to develop and implement approaches such as rapid assessment and intervention for people before they spend a night on the streets.
- We will ensure that preventative work begins at the earliest point possible and develop an action plan for joint implementation to help reduce the number of those sleeping rough after leaving institutional settings.
- We will build an understanding of an individual offenders' history or risk of rough sleeping into the services we commission to tackle prolific offenders through the Safer Westminster Partnership and funded by the Mayor's Office for Policing and Crime (MOPAC). This will evolve over time and the approach taken by MOPAC to funding 'co-commissioned' services becomes clearer.
- We will improve how we prevent short sentence prisoners who have a history of rough sleeping, or who have been in a hostel, from returning to the streets upon release from prison, by working with the CRC and directly with prisons to ensure continuity of support and reducing confusion.

## Priority b – Supporting people to rebuild their lives

### Our objective

All who find themselves on Westminster's streets are identified quickly and have their needs accurately assessed.

### Overview

This is a critical area of work for Westminster, carried out by our vital outreach teams. We support the majority of people away from the streets so they don't spend a second night out.

### Our approach

We ensure there is a rapid response for new rough sleepers so that they do not need to spend a second night out on the streets. Our outreach services - which work 365 days a year - intervene as early as possible to find them a sustainable route away from the streets.

There is a critical role here for the public, residents and businesses to report rough sleepers to ensure our services can react quickly.

The needs of every rough sleeper are assessed to help find the best route away from the streets for them. For those who have complex issues and may not engage with us at first, our outreach teams continue to work with them, building up trust, to find them the most effective way off the streets for them.

### Our new commitments

- We think that giving more time to working intensively with a person to understand their needs, and helping to find the right solution for them at the beginning of our engagement, is more likely to be successful in preventing them from becoming homeless again. To do this we will commission a new assessment centre where rough sleepers can be referred for an extended period of assessment to prevent them becoming entrenched. They will be able to stay there for up to 30 days while they have their needs assessed and will be helped to find the most appropriate solution. Any particular needs around, for example, mental health and substance misuse, can be accurately assessed and a plan put into place to address those needs. We have already secured over £600,000 in external funding through the Department for Communities and Local Government (DCLG) to invest in the development of the assessment centre.
- We will introduce a new person-centred assessment and referral process which will be used by all agencies working with a rough sleeper across the sector. This will help simplify and streamline the process for rough sleepers and agencies. It will also facilitate the sharing of information about those being helped and the support they have been provided with at all stages of the process.

### Our objective

Every rough sleeper is offered a personalised and sustainable route away from the streets, based on their circumstances.

### Overview

Offering every rough sleeper a personalised and sustainable route away from the streets is at the core of this strategy. Our aim is to ensure that people have a route which gets, and keeps them away from the streets so that things do not deteriorate further.

### Our approach

Based on our initial assessment of rough sleepers, we compile a personalised package to take into account a range of associated factors including how long the person has been rough sleeping; whether they have local links in Westminster; whether they have support needs; and if they can access housing benefit.

Where an assessment shows an individual has local links to an area outside Westminster where they can access accommodation, families, friends, support networks and/or services, we may make an offer of a planned reconnection back to their home area. Reconnection can help people rebuild their lives in a sustainable manner, building on pre-existing social ties and support. There will be cases in which this may not be appropriate, for example if there are overriding health needs, public or personal safety issues – no one can be expected to return back to their home area where there is a risk of violence.

For non-UK/I nationals, we work in partnership with the Home Office Immigration Enforcement to reconnect them to their home country, where this is appropriate. For those non-UK/I nationals who have significant support needs or have complex immigration cases, we provide more tailored support. We follow St Mungo's and Home Office guidance to address the needs of vulnerable foreign national rough-sleepers. We will continue to develop specialist support for vulnerable non-UK rough sleepers and victims of trafficking and modern slavery and also continue to broker and facilitate a small number of bed spaces for individuals with No Recourse to Public Funds for a short period of time to allow solutions for those concerned to be found.

Supported accommodation in Westminster is prioritised for vulnerable individuals who have identified links here or for those for whom reconnection is not appropriate. This provision includes 24-hour specialist hostels and semi-independent housing with specialised support.

People receive support here to help them turn their lives around, regain their independence and address the complex issues they may be facing.

### Our new commitments

- We will provide an enhanced reconnection service to UK residents who need it. Additional support will be provided to vulnerable people who are being reconnected to their home area, linking them into support and services they may need. We have partnered with the GLA to deliver this through a new service funded by the DCLG.
- We will re-commission our accommodation services for rough sleepers in the city, looking to build in new ways of delivering services based on outcomes and introduce a small payment-by-results element to contracts and more opportunities for local involvement. We will work with our partners in the sector to deliver this approach - in particular to think together about new ways we can do things. We don't have all the answers; our focus will be on encouraging ideas and solutions from the experts who work with people on the frontline.
- We will explore the use of multi-disciplinary team models when re-commissioning both our outreach teams and accommodation services. These will bring together experts and professionals to tackle the various issues associated with rough sleeping that often need specialist support, including physical and mental health, immigration and housing advice. We are keen to develop different service models to increase chances for people to make changes.
- By linking in with Westminster's wider employment service offer, we will ensure that those service users who are ready to work are given the opportunity to move towards employment as a lasting route away from the streets. We will also do this by enabling more people in our accommodation services to volunteer and gain work and life skills through this route. To help deliver on this we will make seed funding available for projects that offer new ways of supporting rough sleepers, with a focus on those that can help people build up life skills, such as literacy and numeracy designed to be attractive and accessible to clients.
- We have developed a Housing First pilot in partnership with a registered provider and recognise its potential benefits. The outcomes from the pilot will be analysed and further Housing First approaches will be explored and commissioned within our new outreach contracts if it proves successful.

## Our objective

Improvements in the health and well-being of rough sleepers, with a particular focus on addressing mental health and substance misuse issues.

## Our approach

Westminster already has robust and effective joint-working arrangements with health and care partners across the city, including NHS England, Central and West London Clinical Commissioning Groups (CCGs) and other agencies. The multi-agency Westminster Health and Wellbeing Board leads this joint approach and we will work closely with the Board to ensure there is effective strategic oversight in delivering this priority.

We are already working with our CCG partners, together providing joint leadership and innovation in our approach to improving the health of rough sleepers in Westminster, whether accommodated or on the streets. These innovations are having an impact - 99% of people in our accommodation and over 90% of our core rough sleepers on the streets are now registered with a GP. We will continue to facilitate planned access to the NHS for rough sleepers, to prevent more people from needing to use pressured and costly hospital services inappropriately or only using them at times of crisis. We work with the Police to stop the supply of psychoactive substances onto the streets and raise awareness of the devastating impact of these drugs with users and those trying to help (such as our partners and the wider public).

## Our new commitments

- We will work with our CCG partners to take forward the commitments to rough sleepers contained in our Joint Health and Wellbeing Strategy.
- We will work with the NHS and specialist services to expand on a 'pre-treatment' approach, bringing NHS services to people who may find it difficult to access and engage with mainstream therapy and treatment. We will build on pilot projects already underway to trial this approach, such as drop-in counselling and problem gambling and anger management support services.
- We will find new ways of working with people who revolve in and out of our services, including the introduction of trial runs in our supported accommodation or training flats to help build confidence.
- We will commission a new specialist service aimed at helping those whose accommodation placements repeatedly break down and who are regularly excluded from other services.
- We will ensure our services respond to the psychological and emotional needs of rough sleepers by ensuring every service meets the Psychologically Informed Environment (PIE) standard and that this is monitored consistently.
- We will explore new routes into treatment services for rough sleepers in accommodation services. A new service for local people who have a dual-diagnosis has recently been launched and the success of this will be monitored and assessed.

## Our objective

Female rough sleepers are supported in a manner which is appropriate and sensitive to their needs.

## Overview

In 2015-16, 17% of rough sleepers in Westminster were women. However, it is likely that this figure is an underestimate due to the 'hidden' nature of rough sleeping among women and the specific dangers they face, including increased threats of violence, abuse and sexual exploitation. The triggers and experiences of female rough sleepers tend to be distinct, something which was confirmed in the interviews carried out during the WHAT week.

## Our approach

We have in place a number of specific services for women, including dedicated hostels and an overnight safe space for older women. We have supported a number of innovations, including sponsoring and securing funding for a very successful pan-London project which provides targeted support for female rough sleepers with mental health problems.

## Our new commitments

- A range of services will be remodelled to provide more spaces to meet the needs of female rough sleepers: 2 services will be remodelled to accept women and their dogs; one will be remodelled to specialise in providing move on for stable couples and a short term training flat will be created.
- Improved joint working will be put in place with the domestic violence charitable sector and funding will be sought from dedicated funding streams for a female only emergency 'safe space' overnight option to ensure that we do not miss windows of opportunity with very vulnerable female rough sleepers.
- A pilot will be developed to embed practical techniques to respond to women who have experienced trauma in everyday hostel work; including training for workers, psycho-education groups and symptom management.
- Match funding will be provided to continue the female entrenched rough sleeper project targeting older women with mental health problems moving across London boroughs up to 31 March 2018.

## Priority c – Protecting communities from anti-social behaviour associated with rough sleeping and intervening to stop dangerous behaviour.

In partnership with the Metropolitan Police, we are developing a separate, dedicated action plan to take a strategic approach to on-street anti-social behaviour and crime in Westminster which may or may not be committed by rough sleepers. This following table identifies how we will deal with those issues that are directly associated with rough sleeping and negatively affect our communities, although the actions are ultimately geared towards supporting rough sleepers to turn their lives around.

### Our objective

Rough sleepers who refuse to engage and pose a danger to themselves or others are subject to enforcement action with a view to changing their behaviour.

### Overview

Rough sleeping is not an acceptable way of living in an area like Westminster. We do however, believe that rough sleeping is always dangerous for the individual and can be damaging for the wider community. We want to make it absolutely clear that there are consequences should rough sleepers ignore our support and behave inappropriately on our streets.

The most common types of anti-social and criminal behaviour associated with rough sleeping that we see in Westminster are begging, street urination, low-level intimidation, defecation, abandoned waste and drug activity. There may, of course, also be other activity committed by rough sleepers that is a nuisance or concern to communities and we will always respond to such issues in line with our wider strategic approach to on-street crime and anti-social behaviour and our legal responsibilities.

We also see enforcement action as a tool to encourage rough sleepers to take positive steps to change their lives. Although ideally we would not have to take such action, we are fully prepared to do so as a last resort and will always attempt to place positive behavioural conditions on individuals, such as engaging with support, as part of our case against them.

### Our approach

As noted throughout this strategy, our outreach services talk to every rough sleeper in the city and provide them with a reasonable offer of a route away from the streets. If this offer of help is refused and their behaviour is a threat to their own wellbeing or threatens others, we will take action to protect everyone and move towards a sustainable solution for the rough sleeper.

We take action against unacceptable and anti-social behaviour and seek to reduce the impact of these activities primarily by using the powers available to us under the Anti-Social Behaviour, Crime and Policing Act 2014 such as Community Protection Notices (CPNs).

Through our City Management Services, we work with the Police and others such as Business Improvement Districts (BIDs) and land owners to gather evidence on the behaviour of individuals which can be used in criminal prosecution cases where appropriate. We are committed to working together with BIDs to make targeted interventions to help reduce rough sleeping in their areas, primarily through training security teams and increased reporting.

We have worked successfully with the Police and Home Office Immigration Enforcement to pilot a new joined-up approach to the issue of EU nationals who end up rough sleeping. This has involved testing a process of administrative removal for those individuals not observing the requirements of EU freedom of movement rules. This has led to a change in the Home Office operational approach whereby in certain instances rough sleeping is considered an abuse of free movement rights and EU nationals can be removed from the UK where it is proportionate to do so.

Staff are trained to identify where rough sleepers have been victims of crimes such as trafficking and they know how to respond appropriately. It is important that authorities are able to go after the individuals behind such crimes, and we will do everything possible to support the Police, National Crime Agency and others involved in tackling these issues.

### Our new commitments

- Jointly with the Metropolitan Police, we will develop a dedicated action plan to tackle street-based anti-social behaviour and criminality.
- We will provide all appropriate frontline staff (including partners' staff) with information to share with rough sleepers on the support that is available to them and the consequences of not engaging or behaving anti-socially.
- Where necessary and appropriate, we will look to work with organisations and services to provide security which will address issues inside the facilities used by rough sleepers and in the surrounding area.
- We will work towards embedding the use of rough sleeping assessments and data in our City Management services to ensure that enforcement is only undertaken in full knowledge of an individual's situation and only as a last resort. This will allow us to target our enforcement efforts on those individuals who may benefit the most from our intervention whilst ensuring that we are protecting communities from their behaviour.
- We will maximise the impact of our on-street presence through our frontline staff, from our City Inspectors to our parking marshals and waste contractors, getting them to act as the eyes and ears of the council in implementing this approach to enforcement.

# Glossary

**Central and Eastern Europe (CEE):** a term used by the Organisation for Economic Co-operation and Development for the group of European countries comprising Albania, Bulgaria, Croatia, the Czech Republic, Hungary, Poland, Romania, the Slovak Republic, Slovenia, and the three Baltic States: Estonia, Latvia and Lithuania.

**Combined Homelessness and Information Network (CHAIN):** the multi-agency database recording information about rough sleepers and the wider street population in London.

**Clinical Commissioning Groups (CCG):** clinically-led statutory NHS bodies responsible for the planning and commissioning of health care services for their local area.

**Complex trauma:** may be diagnosed in adults or children who have repeatedly experienced traumatic events, such as violence, neglect or abuse.

**Corporate Social Responsibility (CSR):** aims to ensure that companies conduct their business in a way that takes account of their social, economic and environmental impact. It can take many forms and target a range of issues.

**Dual Diagnosis:** the term used to describe patients with both severe mental illness and problematic substance misuse.

**European Economic Area (EEA) National:** someone who is a citizen of one of the countries in the European Economic Area, which includes EU countries and also Iceland, Liechtenstein and Norway.

**Enforcement:** the formal act of compelling observance of or compliance with a law, rule, or obligation (civil or criminal).

**Freedom of movement rights:** freedom of movement allows citizens of the European Union (EU) to move to, live in, and in certain circumstances access the welfare system of the EU country to which they have moved.

**Health and Wellbeing Board:** the forum administered by the council bringing together key leaders from the health and care system work to improve the health and wellbeing of the local population and reduce health inequalities.

**Homelessness:** a broad term which includes people who live in unsuitable housing, don't have rights to stay where they are or are sleeping rough.

**Home Office Immigration Enforcement:** the division of the Home Office responsible for enforcing immigration law in the UK.

**Joint Strategic Needs Assessment:** a process by which local authorities, clinical commissioning groups (CCGs) and other public sector partners jointly describe the current and future health and wellbeing needs of its local population and identify priorities.

**Mayor's Office for Policing and Crime (MOPAC):** a functional body of the Greater London Authority responsible for oversight and direction of the Metropolitan Police Service.

**Novel psychoactive substances: (also previously known as "legal highs"):** synthetic substances which are designed to mimic the effects of other drugs such as hallucinogens, ecstasy or cannabis; but are often cheaper and more readily available than other drugs. The recently enacted Psychoactive Substances Act 2016 bans the production, supply and importation of these substances.

**No First Night Out:** a project working across some local authorities which seeks new approaches to prevent individuals from sleeping rough for the first time.

**No Recourse to Public Funds:** an immigration condition restricting access to public funds, including many mainstream benefits such as welfare and housing.

**No Second Night Out:** a service commissioned by the Mayor which focuses on helping those who find themselves rough sleeping on the streets of London for the first time.

**Non-UK/I National:** a person who is not a citizen of either the UK or the Republic of Ireland.

**Personality disorder:** conditions in which an individual differs significantly from an average person, in terms of how they think, perceive, feel or relate to others.

**Psychologically Informed Environment (PIE):** an approach to service delivery which ensures that provision takes account of, and responds to, the emotional and psychological wellbeing needs of the individual.

**Reciprocal Agreement:** an agreement between one or more local authorities to provide services for a rough sleeper in another borough, which may be better suited to the individual's needs.

**Reconnection:** the process by which people sleeping rough, who have links with another area where they can access accommodation and/or social, family and support networks, are supported to return to this area in a planned way.

**Rough Sleeping:** a term which refers to people who are sleeping or bedding down in the open air, in places such as streets, doorways, parks, benches or bus shelters, or even in sheds, car parks or tents.

**Social Investment:** the use of finance to achieve a social, as well as a financial return.

**Social Value:** a way of thinking about how scarce resources are allocated and used. It involves looking beyond the price of each individual contract and looking at what the collective benefit to a community is when a public body chooses to award a contract.

**Street Counts:** one the means of monitoring rough sleeping by counting all the rough sleepers in Westminster on one night every few months.

**StreetLink:** a national referral service for the public to connect people sleeping rough with local services.

**Supported Accommodation:** accommodation commissioned by the council that provides specialist support (to varying degrees) to former rough sleepers and other vulnerable people.





City of Westminster

City  
for  
All