

# LONDON BOROUGH OF CROYDON

<b>REPORT:</b>	<b>COUNCIL</b>
<b>DATE OF DECISION</b>	<b>17<sup>th</sup> July 2024</b>
<b>REPORT TITLE:</b>	<b>Homelessness and Rough Sleeping Strategy 2024/2029</b>
<b>CORPORATE DIRECTOR / DIRECTOR:</b>	<b>Susmita Sen, Corporate Director for Housing / Beatrice Cingtho-Taylor, Director of Housing, Homelessness Prevention &amp; Accommodation</b>
<b>LEAD OFFICER:</b>	<b>Simon James, Change Manager (Housing)</b>  Email: <a href="mailto:simon.james@croydon.gov.uk">simon.james@croydon.gov.uk</a>
<b>LEAD MEMBER:</b>	<b>Councillor Lynne Hale, Cabinet Member for Homes and Deputy Mayor</b>
<b>CONTAINS EXEMPT INFORMATION?</b>	<b>No</b>   Public
<b>WARDS AFFECTED:</b>	<b>All</b>

## 1 SUMMARY OF REPORT

- 1.1 The purpose of this report is to approve the Council's Homelessness and Rough Sleeping Strategy 2024-29 that sets out the Council's approach to tackling homelessness and rough sleeping in the borough.
- 1.2 On 18<sup>th</sup> April 2024, the Executive Mayor in Cabinet agreed that the Homelessness and Rough Sleeping Strategy be recommended to Full Council for approval.
- 1.3 The strategy is a statutory requirement and forms part of the Improvement and Assurance Panel Exit Strategy Action Plan for the Council. The strategy is also a policy framework document reserved to Full Council for approval.

## 2 RECOMMENDATIONS

- 2.1 Full Council is asked to:
- Consider the Homelessness and Rough Sleeping Strategy Review Summary set out in the report and at Appendix B;
  - Consider the Homelessness and Rough Sleeping Consultation Report set out in the report and at Appendix C;

- c) Consider the Homelessness and Rough Sleeping Delivery Plan in Appendix D
- d) Consider the Equality Impact Assessment set out in the report and in Appendix E
- e) Note that the Scrutiny Homes Sub Committee recommendations and draft Executive response at Section 6 below are due to be considered by Cabinet on 15<sup>th</sup> July 2024
- f) Approve for adoption and publication the Homelessness and Rough Sleeping Strategy 2024-2029 as set out in Appendix A.

### **3 REASONS FOR RECOMMENDATIONS**

- 3.1 Under the Homelessness Act 2002 all local authorities are required to produce a Homelessness Strategy every five years. From 2018 through the Rough Sleeping Initiative, the Government extended this and included a responsibility for Council's to consider Rough Sleeping as a part of the overall strategic objectives. Croydon last produced a Homelessness and Rough Sleeping Strategy between 2019-22. The proposed Strategy is imperative for the Council to deliver on its legal obligations under the Homelessness Act 2022 and Homelessness Reduction Act 2017.
- 3.2 Together with the Housing Transformation programme agreed at Cabinet in December 2022, it sets out the pathway as to how the Council will improve its Homelessness and Rough Sleeping services and produce better outcomes for Croydon residents at risk of being made homeless or homeless.
- 3.3 With several other strategies such as Resident Engagement and Asset Management, the Homelessness Strategy 'sits under' Croydon's five-year Housing Strategy agreed at Full Council in December 2023. They provide the necessary strategic direction for the service and drive through the changes that are needed.
- 3.4 Without an approved strategy, the Council will be in breach of statutory requirement and there are also reputational implications for the Council's relationship with DLUHC, with potential adverse impact on future Homelessness Prevention Grant funding. This is allocated to Councils to support the delivery of homelessness and rough sleeping strategies, such as offering financial support for people to find a new home, working with landlords to prevent evictions, and providing temporary accommodation.
- 3.5 The Improvement and Assurance Panel (IAP) Exit Strategy Action Plan for the Council includes the requirement for the Housing Directorate to have in place its long-term strategic aims and priorities documents which includes the Homelessness and Rough Sleeping Strategy, necessary to drive forward much needed service improvement.
- 3.6 The Mayor's Business Plan sets the overall direction of the Council, and the Homelessness and Rough Sleeping Strategy will link into the following core objectives:  
  
Outcome 4, Priority 3 of the Mayor's Plan
  - Prevent homelessness by providing advice, guidance, and appropriate support.
  - Review procurement of nightly paid temporary accommodation for homeless people to obtain Value for Money

The delivery, therefore, of an effective Homelessness and Rough Sleeping Strategy is key if the Council is to continue the improvements set out in this report.

- 3.7 The contraventions of the Regulator of Social Housing standards as reported in the Ark Report has highlighted the importance of improving all housing-related services provided to Croydon residents. The Council has acknowledged that improvements are needed within the Housing Needs & Homelessness Service and the Strategy, and its future delivery plan will set out the objectives and actions needed to achieve this.

## **4 BACKGROUND AND DETAILS**

### **Drivers for developing the Homelessness and Rough Sleeping Strategy 2024-2029.**

- 4.1 As outlined above under the Homelessness Act 2002 (and Homelessness Reduction Act 2017), the Council has a statutory duty to produce a Homelessness and Rough Sleeping strategy for the borough. In the short term, London Councils are experiencing a significant rise in homelessness with Croydon now having over 3,000 households in temporary accommodation. Combined with escalating numbers of those who are rough sleeping, the need for a joined-up approach with Voluntary and Statutory Sector partners to reduce these pressures is essential. In the longer term, in a Borough with one of the youngest populations of under 19-year-olds in London combined with a projected 58% rise in over 65's means a planned approach working with housing association partners is needed to prepare for the increased demand for general needs stock and elderly accommodation that this will entail.
- 4.2 The Executive Mayor's Business Plan (see 3.6) has identified the prevention of homelessness as a priority and the strategy sets out the Executive Mayor's intent to improve the Council's services to those in housing need.
- 4.3 The Council accepts concerns raised by residents about the quality of its housing services. The need for improvement has led to the re-organisation of the Housing Needs & Homelessness Service to create a structure which is better able to respond to and prevent the causes of homelessness such as private rental evictions, family & friend evictions, mental health issues, drugs and alcohol problems and incidents of domestic abuse. The production of the Homelessness and Rough Sleeping Strategy provides the focus for what the new service is trying to achieve over the next five years.
- 4.4 In a time of rising homelessness and rough sleeping, when admissions into temporary accommodation are proving particularly costly to London Boroughs, the strategy sets out the intention to work preventatively to stop homelessness from occurring and to reduce the reliance on temporary accommodation. In doing so, the Council will achieve better outcomes for residents as well as better value for money.
- 4.5 As part of this strategy, the Council has carried out a consultation with its key partners and residents of the Borough. The feedback from well over 300 residents and the majority of our key partners is that the Council is not responsive to residents seeking assistance from the Housing Needs & Homelessness Service. Additionally, many of the Voluntary and Statutory Sector were of the view that the Council had withdrawn from

performing its co-ordinating and facilitating role in tackling homelessness in the Borough. The Homelessness and Rough Sleeping Strategy sets out a clear path for improving services for residents and re-setting the relationship with partners working in the borough.

4.6 The Improvement and Assurance Panel (IAP) was commissioned by the Secretary of State for Levelling up, Housing and Communities to advise and assist on the Council's financial recovery strategy and report on the progress of service improvements. In the remit given to the Panel, housing was identified as one of the priority areas for improvement.

4.7 The Exit Strategy (October 2023) devised by the Improvement and Assurance Panel and produced in conjunction with the Council sets out the progress required by 2025. Within the document, it sets out the necessity to produce a Housing Strategy to provide necessary direction for the service. As stated above, the Homelessness and Rough Sleeping Strategy links into the Housing Strategy.

#### **4.8 Methodology for developing the Homelessness and Rough Sleeping Strategy 2024-2029**

4.8.1 In order to develop this strategy, the Council firstly conducted a review of homelessness and rough sleeping in the borough from July to October 2023, which is attached at Appendix B titled 'Homelessness and Rough Sleeping Strategy Summary Review'. The review included the use of homelessness statistics collected for the Department for Levelling Up, Housing and Communities (DLUHC), the Combined Homelessness and Information Network (CHAIN), and the London Mayors KPI's for Rough Sleeping.

4.8.2 In addition, an examination of how Croydon's performance benchmarks with London Local Authorities was conducted using information obtained from DLUHC and CHAIN. The process identified gaps or learning and tried to project future trends for homelessness and rough sleeping in Croydon.

4.8.3. The outcomes of the previous Homelessness and Rough Sleeping Strategy 2019-2022 were also considered. This set the following targets.

- Build 2,000 homes for Croydon residents.
- Extend the Landlord Licensing Scheme after the first 5 years.
- Buy 250 homes for families in need to be let at truly affordable rents.
- Develop a strategic partnership with Crisis to develop our 10-year strategy to end homelessness.
- Continue with our Housing First approach to get our most vulnerable rough sleepers off the streets.
- Build on our Social Lettings Agency pilot to both encourage good landlords and to sustain tenancies.

During this period, the Council's financial position and the confinement of the Covid period meant that these objectives were not delivered and from May 2022 the Executive Mayor undertook to carry out a review of this service and produce a revised strategy

with a greater emphasis on the prevention of homelessness as required by the Homelessness Reduction Act 2017.

- 4.8.4 The preliminary findings from the review were used to seek comments and views on homelessness and rough sleeping in Croydon from partners and whether the initial findings identified the right priorities for the next five years. This involved a consultation exercise which included a user survey, meetings with residents, voluntary groups, and statutory agencies.
- 4.8.5 A short Consultation report, which is attached at Appendix C titled “Homelessness and Rough Sleeping Strategy 2024-2029 Consultation Summary” was then produced summarising the views that have been expressed and any recommendations made that would inform the final Strategy.
- 4.8.6 The six priorities are set out in 4.10.5 to 4.10.11.

### **Commitment to deliver a Homelessness and Rough Sleeping Strategy**

- 4.9.1 With the previous Homelessness and Rough Sleeping Strategy having expired in 2022, the Council sought and obtained agreement with DLUHC to produce a new Strategy by the spring of 2024.
- 4.9.2 On the 24 April 2024, the Homelessness and Rough Sleeping Strategy 2024-2029 was considered and agreed by the Executive Mayor at Cabinet. The development of the Strategy involved a review of outcomes since 2018/19 and a consultation exercise.
- 4.9.3 The Homelessness and Rough Sleeping Strategy 2024-2029 also contains the Council’s commitment to fully implement the Homelessness Reduction Act (HRA) 2017 and gives greater emphasis on the prevention of homelessness by engaging with residents at a much earlier stage to resolve their housing needs.
- 4.9.4 Given significant and fast-moving changes in the local housing market and the introduction of new duties under the Homeless Reduction Act 2017, it is necessary for the Council to produce a new Homelessness and Rough Sleeping Strategy. This strategy reflects the latest trends in homelessness, follows best practice and is compliant with current legislation.
- 4.9.5 It builds on existing work to embed the early intervention and on delivering services that are joined up, holistic and person centric. The strategy is aimed at ensuring that all residents have access to high quality advice and support, and that the service can identify and act to resolve issues before they lead to homelessness.

### **Strategy Ambitions**

- 4.10.1 The Homelessness and Rough Sleeping Strategy 2024- 2029 will be underpinned by a delivery plan which will detail the key actions and milestones to be achieved by 2029 to ensure our strategic priorities and objectives are delivered.

4.10.2 The key milestones will be SMART (specific, measurable, achievable, relevant, and time-bound) and reviewed as part of our Housing Transformation Programme and will align with the Council's key performance indicators and Standards.

4.10.3 The strategic priorities and objectives of our Homelessness and Rough Sleeping Strategy 2024-2029 will also be reviewed against the following priorities.

- The Homelessness Reduction Act 2017 and the requirement for Local Authorities to prevent homelessness from occurring by early intervention.
- The Government's ambition to eliminate Rough Sleeping by 2027
- The Regulator of Social Housing has recently expanded the consumer standards to encompass the accessibility of services to prospective tenants as well as those with a secure and assured tenancy.

4.10.4 In a climate where the cost of homelessness is rising, a responsive and effective Housing Needs & Homelessness Service will require more integrated solutions in partnership with others. We understand that we need to do more for those people in greatest need and take a fresh look at how we can respond better to those groups that draw a disproportionate level of resources from the Council and other public service providers – such as families with multiple and complex needs. This will involve working much more closely with other voluntary and statutory partners in a spirit of partnership, sharing knowledge and expertise, and finding ways to better co-ordinate and integrate our approach.

4.10.5 As a result, this is an ambitious strategy which confirms the Council's commitment to addressing homelessness in the borough. Following engagement with over 350 residents (of whom over 10% had been threatened or experienced homelessness) including statutory, third sector partners and community and voluntary organisations, the Strategy identified six key priorities:

1. Listen to our residents and provide good and responsive services.
2. Act at the earliest possible stage to prevent homelessness from occurring.
3. Reduce the reliance on the use of temporary accommodation.
4. Reduce the numbers of people who are Rough Sleeping in Croydon.
5. Managing stock and facilitating affordable, private rented and social housing.
6. Re-set partnership relationship with the Voluntary and Statutory Sector and deliver a more integrated approach to reducing homelessness.

#### 4.10.6. **Listen to our residents and provide good and responsive services**

We will make our housing service more accessible by carrying out face to face assessment and better communicate what we can and cannot offer. To do this we will ensure all our staff are trained and have the right information they need to support residents in housing need.

We will provide the right information online and, in the community, to support people earlier to plan ahead and make positive housing choices, clearly communicating the different housing options in different stages of people's lives and at key transition points.

We will hold events in the community and offer a rolling programme of training to faith and community groups about homelessness and our services. The aim is to explain what services can be offered to help them provide the right support or signpost people who approach them at an earlier stage so that homelessness can be prevented. The events and training will be targeted in areas where there are higher levels of homelessness in the borough.

#### **4.10.7 Act at the earliest possible stage to prevent homelessness from occurring**

We will make better use of our data to improve our understanding of homelessness in Croydon and how it is affecting particular groups including young people, women and those with mental health difficulties. This will enable us to better target our interventions to achieve positive outcomes.

We will build on the joint work we do with the Family Justice Centre to improve our housing support to survivors of domestic abuse by applying for the Domestic Abuse Housing Alliance (DAHA) accreditation as this issue is one of the main causes of homelessness in Croydon.

#### **4.10.8 Reduce the reliance on the use of temporary accommodation.**

We will aim to utilise existing accommodation effectively and improve our understanding of the market to deliver long term good quality temporary and settled accommodation. We will develop a personalised move-on plan with face-to-face visits for every household that is in temporary accommodation to help them make informed decisions about their settled housing options, as they move on from temporary accommodation.

#### **4.10.9 Reduce the numbers of people who are rough sleeping in Croydon**

We will deliver improved support to single homeless people to reduce rough sleeping using the funding provided by the council and government. We will assess the quality of outcomes and value for money of supported housing contracts and tender to ensure the schemes meet the needs of vulnerable single homeless residents in Croydon.

Working with our community safety partners, we will integrate our outreach presence under an assertive 'hotspot' approach to divert vulnerable rough sleepers away from harmful scenarios and address anti-social street activity.

#### **4.10.10 Managing stock and facilitating affordable, private rented and social housing.**

We will work in partnership with Housing Associations to make the best use of resources, use our existing social housing assets more effectively and revise our housing allocations scheme so that we continue to meet the Council's priorities for allocating our limited social rented stock

The approved Housing Strategy 2023-2028 has a number of workstreams that seeks to drive new supply and effectively monitor new affordable housing.

#### 4.10.11 **Re-set partnership relationship with the Voluntary and Statutory Sector and deliver a more integrated approach to reducing homelessness.**

One of the key priorities is of partnership working and an understanding that homelessness cannot be solved by the Council or the Housing Needs & Homeless Service alone.

The strategy makes clear preventing homelessness is everyone's priority and therefore efficient and effective partnership working is important across the Council, housing providers, public bodies and third sector and voluntary agencies to maximise effectiveness of our collective response in addressing homelessness and rough sleeping in the borough.

As a result, a number of meetings have been held with statutory and voluntary sector partners including Family Justice Centre, Evolve Housing Association, St Mungo's Housing Association, Crisis Skylight, Nightwatch and South Norwood Community Kitchen and the Police. This work has only just begun, and collaboration will continue to deliver the priorities of the strategy.

#### 4.10.12 **Governance**

A Homelessness Prevention Partnership Board which will comprise our key voluntary and statutory partners will be established to deliver on the commitments set out in this strategy. The Board will ensure that the activities are co-ordinated and strengthen partnership working across Croydon to end homelessness together.

### 5 **CONSULTATION.**

5.1 The Homelessness and Rough Sleeping Consultation Report is set out in Appendix C. We consulted on the key themes of the Homelessness and Rough Sleeping Strategy 2024- 2029 through an online survey questionnaire. The survey asked respondents whether they agreed or disagreed with the draft priorities. The online survey was live from 6<sup>th</sup> October to 15<sup>th</sup> December 2023 and received 188 responses and showed broad support for all original five draft priorities and underlying objectives. As a result of the feedback, a further objective on the delivery of a good and responsive service was added.

5.2 Survey responses regarding the draft priorities and objectives and a snapshot of the responses are listed below.

**Priority One: Listen to our residents and provide good and responsive services.**

This has been included as an additional priority following the consultation as many respondents complained about the poor customer experience they had received.

**Priority Two: Act at the earliest possible stage to prevent homelessness from occurring.**

Data provided to the Department of Levelling Up, Housing and Communities shows that Croydon Council performs poorly in terms of preventing homelessness compared with other London Boroughs suggesting that more can be done to prevent homelessness. *94% agreed or strongly agreed with this priority.*



**Priority Three: Reduce the reliance on the use of temporary accommodation.**

Homelessness is on the rise nationally and particularly across London with some Councils experiencing 15% increases in those needing temporary accommodation. The cost of temporary accommodation and bed and breakfast is high, and residents are often housed in such accommodation for extended periods of time. We will use every endeavour to reduce the reliance on the use of temporary accommodation to ensure residents are provided with stable homes. *94% agree or strongly agree with this priority.*

**Priority Four: Reduce the numbers of people who are rough sleeping in**

**Croydon.** Approximately 15% of the rough sleepers assessed in the borough remain living on the streets, and it is key that we continue to provide them with support services. We will also work with partners such as Safer Streets to deter those who refuse an offer of accommodation and cause anti-social behaviour. *79% agree or strongly agree with this priority.*

*Reasons for 15% disagreeing or strongly disagreeing:*

- *Some respondents were of the view that support should be withdrawn or that people could not be helped.*
- *Others wanted stronger action against anti-social behaviour.*
- *Comments were also received about the impact that staying in temporary or hostel accommodation can have upon mental health.*

**Priority Five: Manage our stock and encourage new affordable, private rented and social housing.**

We need to manage our own stock effectively to ensure properties are re-let swiftly, as well as intervene to maintain tenancies in the social and private sectors. In addition, we will work with our housing association partners to increase access to the supply of new affordable and social housing in the borough *87% agree or strongly agree with this priority.*

*Reasons for 9% (23 people) disagreeing or strongly disagreeing:*

- *'Better management and maintenance of existing homes was needed.'*
- *'More social than affordable housing was needed.'*
- *'Rehouse out of Croydon as it is over-crowded.'*

**Priority Six: Re-set partnership relationship with the Voluntary and Statutory Sector and deliver a more integrated approach to tackling homelessness.**

We know that often residents with additional vulnerabilities are at a higher risk of homelessness and we need to work effectively with partners to assist vulnerable residents so as to prevent homelessness. *87% agree or strongly disagree.*

*Reasons for 11% disagreeing or strongly disagreeing:*

- *'Need to invest more in Mental health prevention.'*
- *'Council should be leading and not assigning responsibility to others.'*

5.3 18% of those responding had experienced homelessness or a threat of homelessness.

- 5.4 Meetings were held with Croydon Communities Consortium in which 26 residents attended and the Private Landlords Forum where about 60 landlords attended over 2 sessions.
- 5.5 A further 160 comments were received in the Housing Strategy consultation that related to homelessness.
- 5.6 One to one meetings also took place with key partners including the Family Justice Centre, Evolve Housing, St Mungo's Housing Association, Croydon University Hospital, South London and Maudsley Hospital Trust, Thames Reach, Nightwatch, Crisis Skylight, South West London Law Centres and Southern Housing.
- 5.7 In summary, key concerns raised in the Consultation related to the lack of responsiveness from the Housing Needs and Homelessness Service. The voluntary and statutory partners were also concerned that the Council was no longer carrying out its co-ordinating and facilitating role in tackling homelessness in the Borough.
- 5.8 There have also been two All Member Briefing Sessions with one occurring at the beginning of the process and another to comment on the finalised Strategy.

## **6 HOMES AND SCRUTINY COMMITTEE**

- 6.1 The Homelessness and Rough Sleeping Strategy was discussed at the Homes Sub-Committee on 16<sup>th</sup> April 2024. The Members **agreed** to submit a range of recommendations for consideration by the Executive. The recommendations and the Executive's response is scheduled to be considered at Cabinet on 15<sup>th</sup> July 2024. The draft response to each recommendation is detailed below. Please note, if the responses are amended at Cabinet, a supplement to this report will be issued.
- 6.2 The Homes Sub-Committee recommends that a review of the new homelessness service structure is conducted to provide reassurance that it is meeting its intended outcomes and where these are not being achieved, that an action plan is developed to address these failings as a priority.

**Response** The Housing Needs and Homelessness Service completed a formal review of the service structure in May 2024 and concluded that the new structure is agile, and the additional resources have been put in the right places to ensure the service fully complies with the requirements of the Homelessness Reduction Act 2017.

To support staff, establish working standards and strengthen the 'one team' culture, a training programme is being delivered to ensure all staff working directly with people experiencing homelessness have the right skills. This is complemented by regular staff engagement events, held to bring the service together to collaborate, share successes and learn from each other. This will be monitored through all the priorities of the Strategy.

- 6.3 The Homes Sub-Committee recommends that prevention workstreams within the Homelessness Strategy Delivery Plan are fast-tracked wherever possible, including hospital engagement.

**Response** Some key homelessness prevention initiatives have already started which will be built on. These include:

- The deployment of a dedicated caseworker in local hospitals to support homeless residents following discharge.
- We are working with the Voluntary Sector to find alternative accommodation with asylum seekers given positive decisions who have been asked to leave Home Office hotels or accommodation.
- A staff member is co-located within the Multi-Agency Safeguarding Hub (MASH) to facilitate & promote joint working between Housing and Children's Social Services. These changes will be monitored through Priorities 1,2 & 6 of the Strategy.

6.3 The Homes Sub-Committee recommends that the Council identifies high performing local authorities and engages with them to learn from best practice on how to build more effective working relations with private sector landlords to maintain tenancies where possible.

**Response** The Housing Needs and Homeless Service meets on a monthly basis with Department of Levelling Up, Housing & Communities (DLUHC) Advisors who draw on best practice from other local authorities and provide support to improve service delivery. They are encouraged by the approach to service improvement being taken.

The Council is also an active participant in Pan London Housing Directors, Housing Needs and Temporary Accommodation groups. Sub-regionally the Service participates in local professional forums between local boroughs. This will be monitored through all the priorities of the strategy.

6.4 The Homes Sub-Committee recommends that the Council introduces a gas, electrical and EPC document check for private sector tenants claiming housing benefits.

**Response** The Council is not lawfully allowed to check these documents but will review and implement enhanced ways of working with private tenants in the borough with a view to raising awareness so that tenants know their rights and the options available to them if their landlord acts unlawfully towards them. This will be monitored through Priorities 1,2 & 6 of the strategy.

6.5 The Homes Sub-Committee recommends that the Council establishes a designated point of contact for the charity and voluntary sector for all housing and homelessness-related matters.

**Response** The Service is committed to working with the charity and voluntary sector organisations. As stated in 4.10.12, active engagement with organisations has started and it is intended to establish a 'Homelessness Prevention Partnership Board' to formalise the framework for constructive engagement with key partners including the charity and voluntary sector to deliver the objectives set out in the strategy. This will be monitored through Priority 6 of the strategy.

- 6.6 The Homes Sub-Committee recommends that the Council takes a more proactive role to facilitating good practice amongst housing associations providing accommodation in the borough e.g. on nomination rights and organising estate walkabouts with tenants and local Councillors.

**Response** The Housing Directorate is already hosting senior level meetings with all housing associations that work in the borough with a view to share good practice and enhance working relationships. This is a requirement of the new Consumer Standards published as part of the new social housing regulations. The Directorate will be monitored on this partnership work by the Social Housing Regulator.

## **7 CONTRIBUTION TO EXECUTIVE MAYOR BUSINESS PLAN**

The development and implementation of the Housing Strategy and its three associated strategies (Homelessness and Rough Sleeping, Resident Engagement and Asset Management) are key to ensuring the Council delivers against the following priorities within the Mayor's Business Plan 2022- 2026:

- Get a grip on the finances and make the Council financially sustainable.
- Become a council which listens to, respects, and works in partnership with Croydon's diverse communities.
- Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors.
- Develop our workforce to deliver in a manner that respects the diversity of our communities.
- Ensure children and young people have opportunities to learn, develop and fulfil their potential.
- Invest in council homes to drive up standards and develop a more responsive and effective housing service.
- Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.

## **8 IMPLICATIONS**

### **8.1 FINANCIAL IMPLICATIONS**

Homelessness and Rough Sleeping Strategy 2024/2029 is one of the streams within the housing transformation work streams.

Within these work streams some of the transformation projects have resulted in financial benefits and the realisation of the savings target set in 2023-24. All financial savings are being tracked through the monthly monitoring and are reported to Cabinet through the period monitoring update reports.

The Homelessness and Rough Sleeping Strategy sets out the priorities of the Housing Needs services across 2024-2029. It ensures that the Council complies with its statutory requirements through cost-effective means. An approved Strategy is a statutory

requirement failure to have this would put the Council in a compromised position with the future Government and could impact on the associated funding.

The priorities of the strategy align with business-as-usual priorities of the service is embedding following its restructure. The planned improvements to service delivery will contribute to result in improvements in efficiency and effectiveness.

Implementation of the strategy as described should ensure that homelessness costs are minimised as effective demand management results in fewer households needing high-cost housing support.

Comments approved by Orlagh Guarnori, on behalf of Director of Finance (Deputy s151 Officer), 26/06/24

## **8.2 LEGAL IMPLICATIONS**

- 8.2.1** The legislation concerning homelessness reviews and strategies is set out in sections 1 to 3 of the Homelessness Act 2002 (“the 2002 Act”).
- 8.2.2** Section 1 of the 2002 Act (*“Duty of local housing authority to formulate a homelessness strategy”*) provides that a local housing authority may from time to time carry out a homelessness review for their district and formulate and publish a homelessness strategy based on the results of that review. The authority must exercise that power so as to ensure that a new homelessness strategy for their district is published within 5 years of the date of publication of their last homelessness strategy.
- 8.2.3** Section 2 of the 2002 Act (*“Homelessness reviews”*) sets out the meaning and scope of a homelessness review, which includes conducting analysis of levels and likely levels of homelessness and considering resources available to the authority. The report at Paragraph 4.8.1 and Appendix B sets out the homelessness review undertaken pursuant to this provision.
- 8.2.4** Section 3 of the 2002 Act (*“Homelessness strategies”*) defines a homelessness strategy as a strategy for preventing homelessness in the district, securing that sufficient accommodation is and will be available for people in their district who are or may become homeless, securing the satisfactory provision of support for people in the district who are or may become homeless, or who have been homeless and need support to prevent them becoming homeless again.
- 8.2.5** Before adopting or modifying a homelessness strategy, the authority must consult such public or local authorities, voluntary organisations or other persons as they consider appropriate. The report at Paragraph 5.1 and Appendix C sets out the consultation undertaken pursuant to this provision.
- 8.2.6** In carrying out a homelessness review, and in developing the revised Homelessness and Rough Sleeping Strategy, under Section 182(1) of the Housing Act 1996 the authority must have regard to the code of practice issued by the Secretary of State under Section 214A of the Housing Act 1996, namely the Homelessness code of guidance to local authorities 2018 as updated. Chapter 2 of the Code of Guidance relates to homelessness strategies and reviews. It provides, amongst others, that **“2.11 As part of the homelessness strategy housing authorities should develop effective action plans, to**

*help ensure that the objectives set out in the homelessness strategy are achieved. Action plans could include, for example, targets, milestones and arrangements for monitoring and evaluation.”*

- 8.2.7** The Code of Guidance provides that “housing authorities must keep their homelessness strategy under review and may modify it accordingly.”
- 8.2.8** A copy of the strategy must be available for inspection at the council’s principal office, or a copy provided to member of public if asked for, and under the Code of Guidance the Council should publish the strategy and review documents on its website.
- 8.2.9** Part 7 of the Housing Act 1996 sets out the definition of homelessness, and the duties owed by local authorities to applicants who become homeless or are threatened with homelessness.
- 8.2.10** The Homeless Reduction Act 2017 requires local authorities to intervene at an earlier stage and take reasonable steps to prevent homelessness (to those threatened with homeless within 56 days) and/ or relieve homelessness (through sustaining or securing accommodation) for eligible applicants who become homeless or are threatened with homelessness.
- 8.2.11** The Domestic Abuse Act 2021 amends Part 7 of Housing Act 1996 and now provides a new definition of domestic abuse. The Act extends priority need to all eligible victims of domestic abuse who are homeless as a result of being a victim of domestic abuse and requires local authorities to assess whether an applicant is homeless as a result of domestic abuse.
- 8.2.12** The [Homelessness \(Suitability of Accommodation\) \(England\) Order 2003](#), provides that bed and breakfast accommodation is not considered suitable for families with children and households that include a pregnant woman, except where there is no other accommodation available, and then only for a maximum of 6 weeks.
- 8.2.13** The Strategy facilitates the discharge of the obligations set out in Paragraphs 8.2.9, 8.2.10, 8.2.11, 8.2.12 and 8.2.13 above.
- 8.2.14** The Homelessness and Rough Sleeping Strategy meets the overall requirements of the Homelessness Act 2002, Homeless Reduction Act 2017 and the Code of Guidance Chapter 2, and there is no legal reason why Full Council should not agree the recommendations in this report.
- 8.2.15** The proposed strategy falls within the ambit of the Council’s Policy Framework as defined in the Constitution and is a reserved function of Full Council pursuant to Part 2 article 4.2 and the appendix to article 4.2. The Budget and Policy Framework Procedures Rules under Part 4C also applies.
- 8.2.16** Comments approved by the Director of Legal Services and Monitoring Officer. (1 /07/2024)

### **8.3 EQUALITIES IMPLICATIONS**

Under the Public Sector Equality Duty of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken. This includes any decisions relating to how authorities act as employers; how they develop, evaluate and review policies; how they design, deliver and evaluate services, and also how they commission and procure services from others.

8.3.1 Section 149 of the Act requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Act.
- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.
- Protected characteristics defined by law include race and ethnicity, disability, sex, gender reassignment, age, sexual orientation, pregnancy and maternity, and religion or belief.
- Having due regard means there is a requirement to consciously address the three tenets of the Equality Duty within decision-making processes.
- By law, assessments must be carried out throughout planning and delivery and contain sufficient information to enable the local authority to show it has paid 'due regard' to the equality's duties; and identified methods for mitigating or avoiding adverse impact on people sharing protected characteristics.

8.3.2 The Equalities Impact Assessment undertaken shows the outcome for protected groups is being positive.

8.3.3 Comments Approved by Felisha Dussard Senior Communities Officer 06/03/2024.

## **8.4 CRIME AND DISORDER IMPLICATIONS**

8.4.1 The Strategy alludes to the problem of anti-social behaviour caused by a minority of those who are rough sleeping and the need to co-ordinate work with safer streets to tackle this problem.

### **8.4 OTHER IMPLICATIONS**

Members are referred to Implications on Crime and Disorder, Environment and Risk Management as detailed in the original Cabinet Report at Appendix 1

## **9 APPENDICES**

- 9.1 *Appendix 1 - Homelessness and Rough Sleeping Strategy Cabinet report*
- 9.2 *Appendix A - Homelessness and Rough Sleeping Strategy*
- 9.3 *Appendix B - Homelessness Review*
- 9.4 *Appendix C - Consultation Report*
- 9.5 *Appendix D - Homelessness and Rough Sleeping Delivery Plan*
- 9.6 *Appendix E- Equalities Impact Assessment*