

DRAFT

ROUGH SLEEPING STRATEGY



City of Westminster

Introduction

We are uncompromising in our view that, with the right solutions and bold actions, rough sleeping is not inevitable. As the most visible and damaging form of homelessness, it is something that a leading, twenty-first century global city simply cannot ignore. We are equally firm in our belief – supported by experience – that, with the right support, it is possible for everyone to turn their lives around, even when they face multiple, deep-seated problems.

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. 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 possible, before things deteriorate, and given help to resolve the problems that put them there in the first place and rebuild their lives.

Rough sleeping, and behaviours that are often associated with it, such as begging, drug activity and anti-social behaviour more widely, also have broader impacts on the residents, workers, businesses, visitors and communities we serve. They 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. 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.

Our last rough sleeping strategy covered the period 2013-2016. Over this time we worked closely with our partners to deliver some lasting achievements and meaningful improvements to the lives of rough sleepers. The number of people rough sleeping across the country has increased in recent years and, despite our successes locally, remained 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 draft strategy explains how the council intends to respond to these challenges over the next three years (from 2017-20). It builds on our achievements and shows 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 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.

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 is one we can all do something to help tackle. This strategy is intended to help catalyse the kind of cross-community action which is vital to the outcomes we all want to see – an end to rough sleeping and the harm it brings to those caught up in it.

The current picture of rough sleeping in Westminster

➤ Definition of rough sleeping

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 its most visible and striking manifestation.

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

➤ What we know about 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. A key reason for this is our unique location – in the heart of the capital city and the centre of its transport network (including the major international hub at Victoria Coach Station). It is a place that 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.

To help us monitor the issue and enable us to plan our response, we use the Combined Homelessness and Information Network (CHAIN), a 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 combined¹. While we can help the majority of these off the streets quickly, our street counts suggest that, on any one night, there are around 300 people sleeping rough on Westminster’s streets.

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

➤ Who is sleeping rough in Westminster?

The range of complex causes of rough sleeping in Westminster has increased significantly since we published our last strategy. This means it is important to understand the broad groups we deal with – while always recognising that every individual’s circumstances and needs differ. Based on available intelligence and our work with individuals on the street, we can identify three broad groups currently on Westminster’s streets:

1. **Rough sleepers with complex support needs and entrenched problems.** People in this group have a high level (and often number) of issues, such as substance misuse and mental or physical health issues. They are sometimes referred to as ‘core’ rough sleepers and are predominantly from the UK or Ireland.

¹ Camden 641; Lambeth 445; City of London; 440; Tower Hamlets 395; Southwark 372; Ealing 287; Newham 260

2. **Rough sleepers who are unable or unwilling to secure accommodation in the UK.** People in this group tend not to have the same kind of complex support needs as those in the first group. The majority of this group may not be eligible for housing benefit or have No Recourse to Public Funds status and, as a result, they have limited access to our supported accommodation. They may work, sometimes cash in hand, and may have access to accommodation in other countries.
3. **Rough sleepers with limited support needs, and who are regularly involved with begging and other low level crime.** This group varies significantly in size, depending on the time of year. It is characterised by a lack of willingness to engage with any services and by involvement with anti-social behaviour and crime.

➤ **Non-UK/Irish (I) Nationals**

Since November 2014, the number of non-UK/I nationals has exceeded that of UK/I nationals² and can now make up to 65% of rough sleepers in Westminster on any given night. The proportion of non-UK/I nationals has increased dramatically and has risen by over 400% since March 2012, according to our last street count in May 2016.

Non-UK/I nationals sleeping rough in Westminster raise distinctive issues that mean we have to respond in different ways. 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. 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 believe 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.

We make every effort to ensure that support is available to non-UK/I nationals who are vulnerable and require an intervention (see page 14). For those who do require some support, we have a tailored approach and work in partnership with services such as Routes Home (a service provided by the GLA to support non-UK nationals sleeping rough). For those who don’t require support and who are abusing EU free movement rights, we will continue to work in partnership with the Home Office Immigration Enforcement 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 do sleep rough here.

² 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](#).

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 2020. 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.

We have three strategic priorities to help deliver our ambition:

- 1. Where it is possible for us to do so, taking more action to prevent people from rough sleeping in the first place and providing a rapid response when people do end up on the streets.**
- 2. Supporting people who are sleeping rough to rebuild their lives – and to stay off the street.**
- 3. Tackling anti-social behaviour and keeping the city safe.**

How we are going to deliver

Our overall approach is characterised by innovation and partnership working. 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. It 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, particularly around other funding streams that may be available across the city which can support our objectives. We will also invite companies and philanthropic donors to get involved in this strategy as part of our developing social value strategy, as well as considering how businesses who supply us with services can get involved in addressing some of these issues.

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. This is a common theme throughout the strategy, which is clear about the many roles needed to deliver our goals and achieve more co-ordination across the city.

We are committed to continuing investment in our core services such as outreach and accommodation, whilst also targeting resources at tackling issues early to avoid long-term costs to public services.

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

year³ 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.

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 further implementing 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 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.

So far, the focus has been on the council's leadership role across Westminster and how we must retain overall strategic leadership to build partnerships locally to support a co-ordinated response to complex problems. But these are issues of much wider concern, and tackling them effectively will require London-wide (and in some cases UK-wide) action. There needs to be a more joined-up response to rough sleeping and greater partnership working across London and the rest of the country – particularly as the problems become more complex and resources are increasingly at a premium.

Rough sleeping does not respect borough boundaries; tackling it effectively will mean our actions cannot either and we must work across borders to find lasting solutions for people. There is already some highly effective joint working across London boroughs and the Mayor on this issue, but this could go further. We want to work across areas and levels of London governance to find better ways of tackling the issue. With our track record of innovation and success in dealing with issues on a unique scale we believe we have much to offer in developing and implementing these approaches and will build on these to offer a wider leadership role. We will work with the Mayor and other local authorities, exchanging best practice and identifying areas where we can work together.

Our targets – the difference we will make

Setting targets has an important role in demonstrating our objectives and measuring success in achieving them. It is vital, however, that targets in a complex area like this are meaningful and realistic, particularly given that many of the underlying factors are beyond our control. For this reason, although we are committed to reducing rough sleeping and its impact on communities in Westminster, it would be misleading to set overall targets for reducing the number of people rough sleeping here as we have only limited influence over many of the factors behind this.

³https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/417230/150325_Addressing_Complex_Needs_-_final_publication_amended.pdf

That said, we will include meaningful targets for delivery during the period covered by this strategy to drive improvement in how we deliver our objectives and measure success, which are set out below:

- In 2015-16, 53% of people seen rough sleeping in Westminster who were new to the streets didn't spend a second night out because they were quickly supported off the streets. We want to increase this to at least 75% of new rough sleepers by the end of the strategy.
- We want to further reduce the scale of long-term rough sleeping in Westminster. One of the ways we will measure this is through a reduction in the proportion of rough sleepers who are seen on the streets for more than two quarters of the year. In 2015/16, nearly 15% of all rough sleepers in Westminster were seen for more than two quarters of the year and our target is to further reduce this to 5% by the end of the strategy.
- In 2015-16, 44% of people who left our accommodation (such as hostels, assessment centres and second-stage accommodation) did so for negative reasons, such as returning to the streets or being evicted. By the end of the strategy we want to reduce this to below 30%.
- One of our objectives throughout the course of this strategy is to focus on the mental health of rough sleepers. One way of measuring whether we are having an impact here is if individuals engage with services. Currently, 64% of people in our accommodation services with an identified mental health need are engaging with mental health services. We want to increase this to 80% of people by the end of this strategy.
- Rough sleeping and its associated behaviours have impacts on the wider communities in Westminster. Our aim is to reduce these impacts and one way we will measure this is through a reduction in the percentage of residents who say that homelessness/begging on the streets are problems in their area. In 2015, 20% of residents thought they were problems and our target is to reduce this to 15% by the end of the strategy.

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. We've reviewed the initial findings, which have helped inform this document and will incorporate the final findings in the final version of the strategy.

Priority 1 – Preventing rough sleeping and providing a rapid response

Concerned about a rough sleeper?

There is a simple step anyone can take that can help us start the process of providing help that has the best chance of getting someone off the street sustainably.

If you are concerned about someone sleeping rough contact StreetLink at streetlink.org.uk or call 0300 500 0914. They will make sure details are forwarded to local outreach teams in Westminster, and you can get an update on what happens.

Why is this important?

The best policy on rough sleeping is to stop it from happening in the first place. That will always be our overriding objective. Inevitably, this will not be possible in every case and we 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 possible, we will take more action to prevent homelessness and rough sleeping from happening in the first place. Although the council cannot prevent all rough sleeping, we do know there is more that can be done to support groups where we have the ability to intervene at an earlier stage.

For example, 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.

Most people who sleep rough in Westminster do not, however, have local links here. Our most recent data suggest 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.

What are our objectives?

- a) Where it is possible for us to do so, taking more early action to prevent people from rough sleeping in Westminster in the first place.
- b) Preventing people who are released from prison, discharged from hospital or other institutional settings from ending up on the streets.
- c) Intervening early and assessing needs accurately and quickly for everyone who does find themselves on Westminster's streets.

Objective 1a – Acting early to prevent people from ending up on the streets

Our current approach:

Our Housing Options Service already 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 statement⁴](#).

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.

At time of writing there is increasing discussion about changes that can be made to homelessness legislation to emphasise finding ways of preventing people from losing their existing homes in the first place. A Homelessness Reduction Bill is being promoted that would put prevention on a statutory basis. We support the shift towards prevention, but want to make sure that any changes to the law do not have unanticipated consequences for delivery of the specialist support for rough sleepers outlined in this strategy. We will work with national government and the other stakeholders in the sector to help ensure this does not happen.

Our new commitments:

- We will learn from the 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 when we re-design our housing options service in 2017.
- We will also draw on the learning from the No First Night Out pilots in other London boroughs to develop and implement approaches like rapid assessment and intervention for people before they spend a night on the streets.

⁴http://transact.westminster.gov.uk/docstores/publications_store/housing/draft_housing_strategy_direction_of_travel.pdf

- We will work with authorities in countries with high numbers of rough sleepers in Westminster to encourage their residents to ensure they have sustainable plans in place before they leave to travel here.

Objective 1b – Preventing people who are released from prison, discharged from hospital or other institutional settings from ending up on the streets

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 current approach:

Our reducing re-offending services currently work to ensure that offenders are not in a situation where they have to sleep rough upon release. This includes action to save tenancies, resume housing benefit and secure a suitable address.

We also 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 strengthen communication and co-ordination between prison, probation, health and housing services on how discharge situations can be better managed.
- 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 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 ensuring continuity of support and reducing confusion.

Objective 1c – Intervening early and assessing needs accurately and quickly for all who find themselves on Westminster's streets

This is a critical area of work for Westminster, carried out by our vital outreach teams. We support many people away from the streets so they don't spend a second night out. However, our target is to build on this success – so that by the end of this strategy, at least 75% of people who are new to rough sleeping don't spend a second night out on the streets.

Our current 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 go when they first come off the streets. They will be able to stay there for a period of time 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 addressed at the same time.
- 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.

Priority 2 – Supporting people to rebuild their lives

Why is this important?

For most 'core' rough sleepers with support needs who are living on the streets of Westminster, their housing status is not usually at the root of the problem. This is rather a consequence of more fundamental problems, such as alcohol and drug abuse, mental and physical health issues or other social problems (and often a complex and inter-locking combination of a number of these factors).

We need to work in partnership to help people address these often complicated underlying issues in their lives. Most of these will only be worsened by sleeping rough; tackling them will often require very specialist support provided over a long period of time. This is what many of our specialist services aim to address. Over the course 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.

What are our objectives?

- a) Offering every rough sleeper a personalised and sustainable route away from the streets, based on their circumstances.
- b) Improving rough sleepers' health and well-being, with a particular focus on addressing mental health and substance misuse issues.
- c) Taking a tailored approach to the needs of women who are rough sleeping in the city.
- d) Ensuring that all efforts in the city to help rough sleepers are co-ordinated and focussed on supporting people off the streets.

Objective 2a – Offering every rough sleeper a personalised and sustainable route away from the streets, based on their circumstances

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. The importance of this is reflected in our target to reduce the proportion of people on the streets for more than two quarters of the year from 15% to 5% by the end of the strategy.

Our current 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 here; 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 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.

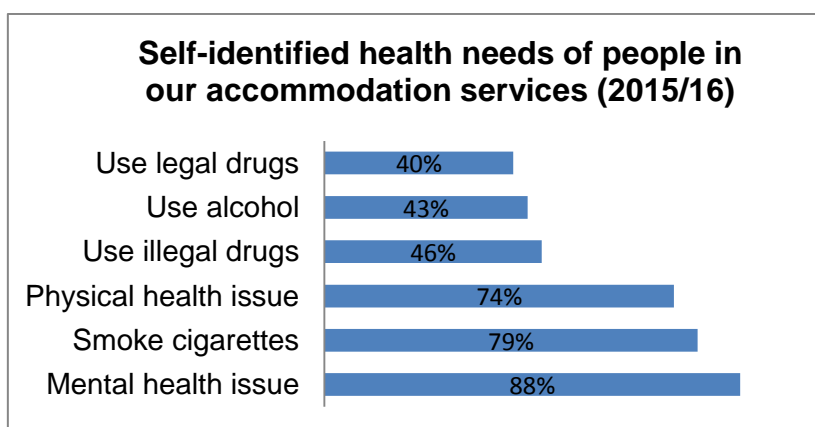
Objective 2b – Improving rough sleepers’ health and well-being, with a particular focus on addressing mental health and substance misuse issues

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 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 2013⁵.

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.

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 course 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.



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

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

⁵ <http://www.jsna.info/document/rough-sleepers>

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, 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 those involved and an ineffective use of resources. This is reflected by our target for the next three years to reduce the percentage of people who leave our accommodation for negative reasons, such as returning to the streets or being evicted from their accommodation, from 44% to 30%.

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 ('spice', for example, mimics cannabis); 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.

Our current 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.

Our new commitments:

- We will work with our CCG partners to take forward the commitments to rough sleepers when our Joint Health and Wellbeing Strategy is launched, building on the expertise within the city and delivering better health and wellbeing outcomes for rough sleepers.
- 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.
- We will work with the Police where appropriate to slow down the supply of NPS 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 focus is not only prevention but supporting the health needs of those using NPS and we are committed to working with substance misuse agencies and health partners to tackle this.

Objective 2c – Taking a tailored approach to the needs of women who are rough sleeping in the city

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 current 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

- While we maintain our strong track record in reducing the number of older women on the street with mental health problems, we will also focus on finding more solutions for the younger group that present with different needs, many of whom have complex histories of trauma and substance misuse.
- We will create even greater accessibility to our services and embed an approach which is informed by the consequences of the kinds of trauma women in this situation have often experienced, working with multi-disciplinary teams who have the expertise to tailor their approach.
- We will also develop more options for women with the above profile who are in couples on the street, with sophisticated responses to circumstances around these relationships, which can include substance misuse, sexual exploitation and domestic abuse.

Objective 2d – Ensuring all efforts in the city are co-ordinated and focused on supporting people off the streets

We understand that to reduce rough sleeping across Westminster, we must deliver overall strategic leadership across the city. Over the course of this strategy, we will have a particular focus on developing our role as the strategic leader and co-ordinator of a city-wide approach, focused on getting people away from the streets.

We know that the public are rightly concerned about rough sleeping and are keen to help people away from the streets. This is an objective that we all share. We want to build on this so that we can work in partnership with the community to make a real difference to peoples' lives and reduce rough sleeping. To do this, we will engage with the public and provide them with the information they need to help them make informed decisions about how they can make a real difference, including through volunteering.

There are a number of other organisations working here to support those on the streets. These can range from faith-based charitable organisations to companies with corporate social responsibility (CSR) programmes. It is important that the council leverages support from these organisations to ensure that the help given by services across the city is consistent, effective and geared towards helping people move away from the streets.

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 understand that some organisations will continue to run such services despite our concerns and there are limited options for the council to stop this.

Our current approach:

We currently engage with other local authorities and non-commissioned services and link in with regional and national decision making through the Greater London Authority and national government (particularly the Department for Communities and Local Government). We have supported the development of the role of non-commissioned services, funding a network for all those wishing to support rough sleepers to share good practice and partner in their approaches.

The success of the WHAT week has shown the success of genuine partnership working and is a model of working together which we would like to build on over the course of this strategy.

We make it easy for people to find opportunities to volunteer to help rough sleepers in the city through our volunteering website [Team Westminster](#). We also run a Time Credits scheme to recognise and reward people's voluntary efforts.

Our new commitments:

- We will establish a strategic cross-council and cross-partner board to oversee the implementation of this strategy.
- We will be 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 increase the opportunities available for people to volunteer, by working with charities in the city to develop new and innovative ways in which people can lend their time to support rough sleepers.
- We will work with the voluntary sector to explore other new ways in which non-commissioned services can provide a more consistent, effective and co-ordinated response, and will consider a quality mark in which providers can work to raise the quality of their service.
- We will provide guidance to the construction sector to minimise the risks of rough sleeping in and around construction sites in the city.

Priority 3 – Tackling anti-social behaviour and keeping the city safe

Why is this important?

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.

Across this priority, our target is to reduce the percentage of residents who say that homelessness/begging on the streets are a problem in their area to from 20% in 2015 to 15%.

What are our objectives?

- a) Ensuring every individual who is rough sleeping is clear about support available to them and the actions and behaviours that are expected of them in return.
- b) Ensuring the unacceptable impact of anti-social behaviour associated with rough sleeping is reduced.
- c) Working with other agencies which are able to tackle criminality and other offences such as breaches of immigration and freedom of movement rules where these are committed by rough sleepers.

Objective 3a – Ensuring that every rough sleeper is clear about support available to them and the actions and behaviours that are expected of them

It is reasonable to be clear with those who end up on Westminster's streets that they have responsibilities, in terms of how they engage with our offers of support away from the streets and the behaviour we expect while they are there.

We provide every individual a reasonable offer of a route away from the streets, and we want to make it clear that there may be consequences if this offer of help is refused and their

behaviour impacts on others. This might include enforcement action if this is required to protect themselves or the wider community.

Our current approach:

Our outreach services talk to rough sleepers about their situation and work hard to encourage individuals to engage positively with support services.

Our new commitments:

- We will develop a new Westminster Rough Sleepers' Charter to ensure every individual who is rough sleeping is clear about both the support they will be given and what will be expected of them. This will be available to Business Improvement Districts (BIDs) and other partners to share with those on the streets.

Objective 3b – Ensuring the unacceptable impact of anti-social behaviour associated with rough sleeping is reduced

Westminster is the UK's cultural, economic and political heartland. Our city contains some of the most recognisable locations and institutions in the world. It is also home to nearly a quarter of a million residents, with that population swelling to 1.1 million every day as workers and visitors pass through the city.

As a local authority, we have a responsibility not only to rough sleepers themselves, but also to our residents, businesses and visitors. Although it is not illegal to sleep rough, there are activities and behaviours that are often associated with rough sleeping which have an unacceptable and detrimental impact on communities.

Littering, street urination and defecation and drunk and disorderly behaviour can be extremely damaging for the areas and communities where they take place.

Our current approach:

We take action against unacceptable and anti-social behaviour and to reduce the impact of these activities by using the powers available to us under the Anti-Social Behaviour, Crime and Policing Act 2014. We have invested in a successful pilot to address street-based, day-time activity, which provides a link between social care and enforcement.

We work with the Police, who have further powers to tackle anti-social behaviour, and with Business Improvement Districts (BIDs), which often take a leading role in addressing such issues in their areas given the impact of rough sleeping on their members' workers and customers. In particular, 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 also work with enforcement agencies to minimise risks to outreach workers and the public at large.

Our new commitments:

- We will embed 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.

Objective 3c – Working with other agencies which are able to tackle criminality and other offences such as breaches of immigration and freedom of movement rules where these are committed by rough sleepers

We know that begging is a major issue of concern to Westminster residents, businesses and visitors. Begging is illegal and it is the responsibility of the Police to address this issue and other low level criminality. It can range from passive begging, which often sustains addictive behaviours, to more aggressive forms targeting Westminster's streets to generate income, often on an organised basis. In some cases, people may have been forced into these activities through crimes such as human trafficking or modern slavery. As noted in objective 2a, staff are trained to identify where people have been victims of these crimes and respond appropriately. It is also important that authorities are able to go after the individuals behind crimes such as trafficking, and we will do everything possible to support the agencies responsible for dealing with them.

Many of those involved in begging are not rough sleepers and the two issues need to be treated distinctly. Furthermore, begging can simply sustain a life on the streets for rough sleepers, rather than helping them to engage in a sustainable route away from them in the way we have explained in this document.

Where non-UK/I nationals are rough sleeping without a clear plan to get themselves off the streets and refuse voluntary reconnection, enforcement action may be required if it is considered proportionate. It is primarily the responsibility of the Police and Home Office Immigration Enforcement to enforce the responsibilities set out in UK, and relevant European Union or other international law during their time in this country.

Our current approach:

We work in partnership with BIDs to enable them to make targeted interventions to address begging and crime in their areas whilst ensuring the individuals involved are signposted to support services.

Through our City Management Services, we gather evidence on the behaviour of individuals which can be used in criminal prosecution cases where appropriate.

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.

We support Operation Unite 16 which focuses on non-UK national offenders to reduce vice, aggressive begging, street gambling, theft and rough sleeping.

Our new commitments:

- We will develop a dedicated action plan to take a strategic approach to tackling begging in Westminster across the different agencies involved.
- We will work with relevant authorities to do more to tackle issues such as exploitation and trafficking.
- For non-UK EEA nationals who refuse help and engage in unacceptable behaviour, we will continue to work with Police and Home Office Immigration Enforcement, who have the power to arrest or where appropriate 'administratively remove' those who abuse their freedom of movement rights.

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.

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.

