

Feedback on the Mayor's draft London Housing Strategy from the Homeless Link and Greater London Authority event 'Tackling London's Housing Crisis' – 17 November 2017

Introduction

This note captures feedback on the Mayor's draft London Housing Strategy (LHS) provided by participants at the event organised by Homeless Link and the Greater London Authority (GLA) as part of a three-month consultation on the strategy.

The purpose of the event was to give organisations involved in tackling rough sleeping and homelessness an opportunity to hear about and discuss the draft LHS, and to support attendees to develop their formal written responses to the consultation. Feedback is set out in relation to the themes of each of the three discussion sessions included in the event programme.

The event started with an overview of the draft LHS, including its context and the process for preparing the strategy. The overview also covered the Mayor's overall vision and provided a brief outline of policies not presented or discussed in detail at this event. Three discussion sessions followed. These focussed on the following themes from the strategy, chosen because of their relevance and interest to organisations involved in tackling homelessness and rough sleeping:

- Discussion 1: Affordable housing, specialist accommodation and the private rented sector (Policies 4.1, 4.2, 4.3, 5.2, 6.1 and 6.2)
- Discussion 2: Preventing and addressing homelessness (Policy 7.1)
- Discussion 3: Supporting rough sleepers off the streets (Policy 7.2)

Each discussion session started with short presentation of the relevant policies from the draft LHS. Attendees were then invited to comment on these policies through table discussions. Discussion covered which proposals attendees did or did not support and why, and their suggestions on further or alternative steps the Mayor might take to address the issues being considered.

Each table was asked to identify one question or suggestion for James Murray, the Deputy Mayor for Housing and Residential Development, in the course of their discussions. James attended the final session of the event, during which he heard and responded to these questions and suggestions.

Discussion 1: Affordable housing, specialist accommodation and the private rented sector

Policy 3.1

The supply of land for homes: Some participants suggested that radical intervention in the operation of the land market is needed. They considered that the way it currently operates lies at the root of the housing crisis.

Vacant commercial sites: Participants suggested that the Mayor could encourage greater use of vacant commercial sites to deliver homes, including by supporting the placement of precision-manufactured homes that can be moved in spaces such as multi-storey car parks.

Policy 3.3

Local authority housing companies: Some participants commented that the Mayor should not support local authority housing companies. They considered that these companies prevent land from being used to develop homes, rather than encouraging it. Some also suggested that local authority housing companies can exclude homelessness organisations from using sites to develop homes.

Chapter 4: Delivering genuinely affordable homes

Participants strongly supported the strategy's commitment to increasing the supply of affordable homes, highlighting pressing need. Most recognised that an increased supply of affordable homes would deliver benefits for those facing or experiencing homelessness, including reducing homelessness services' reliance on private rented accommodation to meet their housing need. Some participants thought that increasing the supply of affordable homes would have the further benefit of making it more difficult for private rented sector landlords to let sub-standard homes.

Some participants suggested that the strategy include clearer targets to measure progress in increasing the supply of affordable homes.

Some participants felt the strategy should recognise more fully the role of stable employment in helping Londoners to afford housing. They suggested that it should therefore emphasise the importance of entry-level jobs being available for younger Londoners and the need to improve the support with employment and skills that is available to Londoners.

Policy 4.1: Genuinely affordable homes

Rent levels for affordable homes: Some participants welcomed the strategy's shift away from rent levels for affordable housing set at up to 80 per cent of market levels, including the pledge not to authorise conversions of existing social rented homes to these rent levels. Some also welcomed the development of London Living Rent, where rent levels are set at one third of average household incomes in an area.

However, some participants questioned whether the strategy really clarifies the meaning of the term "affordable". Participants also raised various concerns about the forms of affordable housing championed in the strategy. In particular, they questioned:

- the extent of Mayoral funding for homes to be let at social rent levels, with some participants suggesting that only homes at these rent levels are genuinely affordable;
- whether London Affordable Rent is affordable to those subject to the benefit cap, including homeless households who need to move on from temporary accommodation;
- whether the poorest Londoners will be able to access London Affordable Rent homes, given that social landlords are introducing new, more stringent criteria for tenants;
- whether, given the two previous questions, there needs to be a new form of affordable home for the very poorest; and

- whether London Living Rent should assume that tenants will move into home ownership after 10 years. Some participants expressed concern about the risk of eviction if London Living Rent tenants are unable or unwilling to buy a home.

Flexibility to deliver precision-manufactured affordable homes: Participants welcomed the strategy's commitment to giving housing providers flexibility to deliver types of genuinely affordable housing in addition to the three main forms it describes. In particular, they highlighted the value of schemes that use precision-manufacturing and/or provide accommodation for homeless households or young people to help meet need. Participants cited the example of Y:Cube. Some suggested that provision of this sort should figure more prominently in the Mayor's Affordable Homes Programme.

Affordable homes for young people: Some participants suggested that a proportion of the affordable homes funded by the Mayor should be ring-fenced for young people, in recognition of the acute challenges they face securing accommodation that they can afford. Some participants also suggested that the Mayor should help young people access housing by funding the development of homes that are designed for younger people to share.

Provision for key workers: Some participants commented that the strategy is unclear in terms of provision for key workers and how this cohort is defined. In addition, some recommended that those who work in homelessness services should be treated as keyworkers.

Housing associations: Some participants questioned the extent to which this policy relies on housing associations, commenting that they do little to provide accommodation for homeless households.

Policy 4.2: Increasing delivery of affordable homes

London Plan affordable housing policy: Participants strongly supported the commitment to increase the proportion of new homes that are affordable through the London Plan. Participants from local authorities reported that a clear planning policy requirement for affordable housing is helpful in negotiations with developers. However, participants made the following comments:

- Some questioned whether it is possible to consistently secure more affordable housing through the planning system, given London's land values. Linked to this, some suggested that, where it is not possible for 35 per cent of new homes to be affordable, the Mayor should make funding available to increase the proportion to at least this level.
- Some questioned how planning policy requirements will be enforced, including ensuring that developers are not able to re-negotiate the percentage of affordable housing to which they have agreed after starting to build a development.
- Some expressed concern about developers who seek to bypass affordable housing requirements by converting commercial premises for residential use within permitted development rights. They asked whether the Mayor could limit these.
- Some commented that even if 50 per cent of new homes are affordable, this will be insufficient to meet need.
- Some suggested that, to make sure vulnerable Londoners benefit from the delivery of more affordable homes, planning policy should stipulate that a certain proportion of new affordable homes must be specialist or supported accommodation.

The role of faith groups in delivery of affordable homes: Participants highlighted the potential for faith groups to support the delivery of affordable homes, both because they are concerned about those who struggle to afford housing and because they often have land on which homes could be developed. They recommended that the GLA provide adequate support and funding to support faith groups seeking to contribute to housing supply.

Policy 4.3: Protecting London's Affordable Homes

Like-for-like replacement of homes sold under the Right to Buy: Some participants doubted that the GLA could have much influence on the like-for-like replacement of homes sold under the Right to Buy, in part because they felt the resources for replacement were lacking. They suggested that the GLA should instead lobby for the abolition of Right to Buy.

Replacement of homes demolished as part of estate regeneration schemes: Some participants commented that the policy of ensuring that homes demolished as part of estate regeneration schemes are replaced on a like-for-like basis will only have a limited impact, because GLA can only influence schemes that it funds.

Estate regeneration and households living in temporary accommodation: Others suggested that the Mayor's Good Practice Guide to Estate Regeneration should address the question of whether the right of return should be given to households for whom homes on estates where regeneration is planned are used as temporary accommodation.

Policy 5.2: Meeting London's diverse housing needs

Investing in supported housing: Participants broadly supported the strategy's commitment to supporting independent living and, in particular, to investing in supported housing for those with long-term needs. However, they raised the following concerns:

- Limited or uncertain revenue funding means that vulnerable Londoners often do not get the support they need. Some participants therefore strongly supported the strategy's commitment to lobby Government for adequate revenue funding for supported housing. Others felt that the Mayor should take a stronger position on this issue.
 - Some argued he should do more to highlight the risks to supply that Government's proposals present, particularly for accommodation defined as short-term.
 - Some suggested that he should provide revenue funding to help ensure an adequate supply of supported accommodation.
- Some highlighted the scope for the Mayor to assist with the transition to new funding arrangements, so that these do not result in a short-term increase in homelessness.
- Some expressed concern that existing provision is not always sufficient to meet needs. They suggested that GLA assess the scope for supplementing the supported housing commissioned by local authorities.
- Some suggested that there is a surplus of sheltered and extra-care accommodation, meaning there is no need for further investment in this provision.
- The need for housing for ex-offenders, those with mental health and/or substance misuse problems and other complex needs should be explicitly recognised within policy 5.2.
- City centre sites formerly used for prisons or mental health services provide particularly good locations for the development of new supported accommodation.

Using volunteers to support independent living: Some participants highlighted the value of the keyring model in supporting independent living. This involves one volunteer being linked to a number of people who have support needs but live in their own home within a local area. The volunteer supports these people to live independently and to support each other.

Refugee resettlement: Some participants suggested that the Mayor should lobby Government to accept more refugees for resettlement and to speed up the rate at which they are accepted.

Policy 5.3: Community support for homebuilding

Empty homes: Some participants suggested that the strategy should go further in providing disincentives to keeping homes empty.

Policy 6.1: Improving standards for private renters

General: Participants were keen for the Mayor to use his powers to improve standards in the private rented sector as fully as possible.

Local authority resources: Participants expressed concerns that local authorities lack the resources to pursue landlords who illegally evict tenants.

Standards for private rented properties: Some participants suggested that the Mayor should set minimum standards for properties in the private rented sector.

Private rented sector licensing schemes: Most participants warmly welcomed backing for well-designed and –operated private rented sector licensing schemes, given that standards in the sector (and particularly in the least expensive homes) can be very poor. They were particularly concerned by low standards because of local authorities’ increasing reliance on the private rented sector to accommodate homeless households. In addition:

- Some participants suggested that pan-London licensing would help to promote consistency in standards. They suggested that voluntary sector organisations would become more involved in reporting poor management standards if licensing was extended.
- Some participants recommended that the Mayor explore the option of using the income generated through licensing to support local authorities’ work to assist homeless households.

However, some participants expressed concern that licensing in the private rented sector might encourage rogue landlords to go underground, fuel homelessness, and/or to make it more difficult for vulnerable people to secure private rented sector tenancies.

Rogue landlord and agent checker: Participants strongly supported plans to introduce a London-wide database listing private landlords and agents who have acted unlawfully. They considered that Londoners should have access to relevant information about prospective landlords. However, some participants noted that those who most struggle to afford rents may not be have the option of choosing to avoid landlords or agents who have broken the law.

Right to Rent: Participants strongly supported the commitment to oppose the Government’s Right to Rent policy, which they considered potentially discriminatory. Some participants

reported service users who are not from a white British background being refused private sector tenancies because of the Right to Rent policy. Some participants noted that landlords can also be reluctant to let to people who speak limited English.

Other steps to help prospective tenants with low incomes secure tenancies: Some participants noted that the poorest would-be private sector tenants, particularly those who have been homeless, can struggle to secure tenancies because they lack proof of ID. They suggested that the Mayor might support a service that would vouch for individuals in this position.

Other participants suggested that the Mayor support services that list landlords who will accept tenants who claim benefits.

Policy 6.2: Improving affordability and security for private renters

General: Participants supported the commitment to improve affordability in the private rented sector, which they identified as prohibitively expensive for many Londoners. However, some participants suggested that the strategy could include more ambitious commitments and do more to emphasise the extent to which the sector is a causal factor in homelessness.

Participants recommended that the Mayor should work with local authorities to encourage them to intervene at an early stage where tenants in the private rented sector fall into arrears. They also noted that, for some, landlords' reluctance to let their properties to those with support needs can be as much of a barrier to accessing private rented accommodation as cost.

Some participants suggested that a London-wide social lettings agency focussed on securing accommodation for the most excluded Londoners would be a real help to this cohort in accessing private rented accommodation.

Letting agent fees: Although some participants were very supportive of the Government's ban on lettings agent fees, some expressed concern that it would reduce the supply of private rented homes or fuel rent increases. Some suggested that the Mayor should outline measures to ensure that this does not happen.

Tenancy deposit loans: Most participants strongly supported the commitment to increase provision of tenancy deposit loans. They felt this would address one barrier to affordability. However, participants made the following suggestions about how this policy could be developed:

- Some advised that it should cover the first month's rent, as well as the deposit.
- Some highlighted the need to help those who are moving within the private rented sector, where they have to pay a deposit to a new landlord before the landlord whose property they are leaving has returned their deposit. They felt that a centralised system for private rented sector deposits could help avoid people ending up in this situation.
- Some suggested that GLA make clear that local authorities should be offering employees these schemes.
- Some suggested that tenancy deposit loans would be useful for staff working in homelessness organisations.
- One participant suggested exploring alternative funding models for such schemes, including crowd-funding and charitable donations.

- Some participants commented that, because these loans are only available through employers, they do not benefit those who most struggle with the costs of housing. They suggested that this could be addressing by local authorities and/or the GLA offering tenancy deposit loans for those not in work.

Welfare reform: Participants very strongly supported the commitment to ask Government to review the financial support available to private renters through the benefits system. They considered that welfare reform severely worsens affordability in the private rented sector, including making it very difficult for people who have experienced homelessness to move on from hostels. (They noted that the latter is a particular problem because the benefits system can also disincentivise work.) Some participants suggested that the Mayor should highlight the adverse impact on younger single people of extending the Shared Accommodation Rate from those aged less than 25 to those aged under 35.

Security of tenure: Participants noted that vulnerable Londoners living in the private rented sector often fare especially poorly when landlords evict them, sometimes illegally, because they lack the confidence, skills or knowledge to navigate this situation.

Participants welcomed the strategy's commitment to explore options for improving private rented sector tenants' security. They identified insecurity as a huge issue for private sector tenants. They expressed particular concerns about landlords' use of pre-emptive section 21 notices and about the impact of insecurity of tenure on people with support needs, who are increasingly accommodated in private rented accommodation. They noted those with support needs who have been placed in private rented accommodation can then end up (unnecessarily) moving into supported accommodation if their tenancies are terminated.

Participants agreed that improving private sector tenants' security requires a change in the law and cannot simply be a matter for landlords' discretion, but rather, . Some suggested that tenancies should run for at least five years.

However, some participants commented that, in order to genuinely benefit tenants, the issue of security should be considered in tandem with rent controls. Others expressed concern that requiring landlords to issue longer tenancies might reduce supply or make them more reluctant to accept tenants seen as high risk.

Discussion 2: Preventing and addressing homelessness

This discussion related to Policy 7.2 in the draft LHS.

General: Participants welcomed the strategy's focus on homelessness. However, some made the following comments and suggestions:

- The strategy include some clear targets around reducing or ending homelessness.
- The strategy fails to recognise the needs of specific groups who are disproportionately likely to experience homelessness, including those with support needs related to substance abuse, those who identify as LGBT+, ex-offenders, and those with complex needs. Participants felt it was important for the Mayor to take the lead in ensuring that the needs of these groups are met, because they may not be a political priority for boroughs. (Some also suggested that the Mayor could ease the pressures on some

vulnerable groups at risk of homelessness by urging local authorities not to charge them Council Tax.)

- The strategy should more fully recognise hidden homelessness, particularly as it affects women.
- The strategy should explain how the Mayor will highlight and address inconsistencies in London boroughs' approaches to homeless households.
- The strategy should contain proposals to ensure that people facing or experiencing homelessness who do not have a connection to a particular area are still able to access help there.
- Many of the proposals covered in Policy 7.1 are already underway, which suggests a lack of ambition on the Mayor's part.

Tackling the root causes of homelessness: Participants supported the strategy's recognition of the wide range of factors that contribute to homelessness, including welfare reform. They welcomed the strategy's call on Government to review changes to the benefits system. Some noted that addressing the root causes of homelessness will help tackle rough sleeping. However, participants made the following suggestions about strengthening the strategy's approach to the root causes of homelessness:

- The strategy should recognise personal debt as one contributory factor to homelessness.
- In commenting on the impact of welfare reform on homelessness, the strategy should emphasise the impacts of Universal Credit.
- Some queried whether the multiple requests of Government contained in Policy 7.1 amounted to "passing the buck". They suggested that the Mayor needs to go beyond lobbying where Government policies that are causing homelessness. For example, they commented that he could help ease the damaging impacts of welfare reform by working with private and social sector landlords to help them understand the benefits system and/or by promoting digital inclusion.
- They suggested that the strategy should identify the reduction in the availability of Legal Aid as one of the factors contributing to rising homelessness and call on Government to provide more funding for legal advice.

Interventions to prevent homelessness: Participants welcomed the commitment to preventing homelessness, though some suggested the Mayor should urge Government to increase the funding allocated to local authorities for this purpose.

Some participants highlighted the need for a common understanding of homelessness prevention, which emphasises keeping people in existing accommodation and identifies the specific interventions that can deliver this outcome. Linked to this, some participants recommended that the strategy recognise the value of floating support services (which have been subject to heavy reductions in funding over recent years) in preventing homelessness.

Some participants commented that the GLA could do more to identify people at risk of homelessness as far "upstream" as possible. Examples they suggested included the following:

- working with local authorities to support successful homelessness prevention initiatives and highlight best practice;
- in particular, encouraging local authorities to intervene at an early stage where private rented sector tenants fall into arrears – perhaps by establishing a Social Impact Bond to support tenancy sustainment;

- working with social landlords to encourage positive approaches to tenants in arrears (particularly where these result from Universal Credit), thereby minimising evictions; and
- helping identify homes affordable to young Londoners starting out in employment.

Homelessness Reduction Act: Participants largely welcomed the strategy's support for the Homelessness Reduction Act. They commented that the Act provides welcome encouragement for preventing homelessness and ensuring that a wider range of those facing or experiencing homelessness receive help. Some considered that the GLA should do more to support the Act. They suggested the following possibilities:

- supporting the greater coordination of the partnership working that the Act will require, particularly coordinating work between voluntary sector organisations and local authorities;
- providing information to those facing or experiencing homelessness about the services available to them; and
- providing additional funding to support implementation of the Act.

Some participants expressed the following concerns about the Homelessness Reduction Act:

- The Government's funding for implementation is entirely inadequate and the basis for allocating it is unclear.
- One local authority commented that the legal processes required by the Act will place an undue burden on local authorities who have a strong track record in preventing homelessness.
- 56 days may not be long enough to prevent homelessness where mediation, support with money management or substance misuse treatment are needed to prevent someone from becoming homeless.
- Supporting People funding constituted a much more effective approach to preventing homelessness.
- Voluntary sector organisations who assist those facing or experiencing homelessness need further guidance on the Act.
- The Act's ethos of universal access to help is insufficiently clear.

In part reflecting these concerns, participants emphasised the importance of the Mayor lobbying Government to adequately resource local authorities to implement their new duties.

Youth homelessness: Participants welcomed the strategy's recognition of youth homelessness as a challenge that requires specific intervention. Some participants strongly supported the Mayor's call on Government to reverse the automatic removal of entitlement to the housing support element of Universal Credit from 18 to 21 year olds. Participants also endorsed the Mayor's commitment to fund specialist accommodation for young people, However, some participants felt that the strategy needed to go further on the issue of youth homelessness. Suggestions on how it might do so included the following:

- It could provide a fuller account of the factors that can contribute to young people becoming homeless (In relation to this, some participants noted recent reports of rising homelessness among recent care leavers.);
- It needs to consider approaches to accommodation for young people at risk of homelessness other than Platform for Life, because the viability of that model is undermined by welfare reform. Some noted the value of Nightstop and suggested that the Mayor publicise it.

- It should recognise the need for specialist move-on accommodation for young people.
- It should contain commitments from the Mayor to do more to directly support young people, including supporting youth clubs and other forms of provision for young people.

Violence Against Women and Girls: Participants warmly welcomed the strategy's commitment to support those fleeing violence against women and girls (VAWG), including domestic abuse – in part because they felt that the needs of this group can often be hidden. However, some suggested that the strategy should adopt a broader definition of VAWG, that recognises the part it can play in continuing complex needs.

Participants supported the strategy's recognition that it is important to prevent those fleeing VAWG from losing their accommodation. Some suggested that the Mayor should do more to help ensure those who have suffered VAWG cannot be forced to leave social housing by taking civil action against perpetrators who occupy social rented accommodation.

Some participants recommended that the Mayor should require a proportion of the affordable homes that he funds to be ring-fenced for those who have experienced VAWG.

Some participants suggested that GLA should adopt a more ambitious policy on refuges. Their suggestions included the following:

- The Mayor should recommend that local authorities remove any local connection requirements they have adopted for the refuges they commission. These can make it difficult for survivors of VAWG to secure the help they need.
- The Mayor should seek to lead provision of refuges in London, given that those who require such accommodation typically need to be accommodated outside their local authority area.
- The Mayor should call for a review of refuges and how they are used. The reluctance of many of those who have experienced VAWG to access refuges demonstrates the need for a review.

Former armed forces personnel: Some participants suggested that the strategy should contain a stronger commitment to ensure that veterans do not experience homelessness. They recommended that the Mayor support this pledge by undertaking more coordinated work with the charities that support former service personnel. Other participants felt that well-defined and well-resourced services and pathways for veterans already exist.

Accommodation for homeless households: In relation to accommodation for homeless households, participants recognised the huge demands that securing private rented accommodation can place on local authority resources. Some noted that the lack of long-term funding for boroughs' work to accommodate homeless households makes it difficult for them to plan.

Participants expressed a range of views about homeless households being accommodated away from their local area:

- Some felt that there was a lack of reliable data on the extent to which this happens.
- Some highlighted the difficulties that can result when people are accommodated outside London.

- Some criticised Inner London boroughs for placing homeless households in Outer London and thereby fuelling increases in rents.
- Some felt that the Mayor should make clear that it is unacceptable to place any homeless household away from their local area, unless a household wants to move.
- Some identified the reciprocal arrangements that some London boroughs have with local authorities outside the capital. They recommended that the Mayor support boroughs to explore the scope to extend these.
- Some suggested that the strategy's recommendation that boroughs should ensure support is in place for homeless households placed away from their local area shows a lack of recognition of the barriers that the Social Care Act poses to doing so.

Some participants suggested that the strategy should highlight the importance of boroughs providing temporary accommodation of a type that meets the specific needs of some homeless households.

Some participants noted the use of homes on estates due for regeneration to provide temporary accommodation. They commented that those placed there should be recognised in the Mayor's Good Practice Guide to Estate Regeneration.

Some participants welcomed the Mayor's commitment to help local authorities collaborate more closely in sourcing accommodation for homeless households. However, some commented that any arrangements for closer collaboration need to include charities as well as local authorities, so that they avoid competing for accommodation for homeless households.

Some participants commented that housing associations could do more to provide accommodation for homeless households.

Participants welcomed the Mayor's support for schemes whereby precision-manufactured are placed on sites that are available in the short to medium term to provide accommodation for homeless households.

Discussion 3: Supporting rough sleepers off the streets

This discussion related to Policy 7.2 in the draft LHS.

General: Participants were generally supportive of the strategy's commitment to support rough sleepers off the streets. Some suggested that it should take the form of an ambitious pledge to end rough sleeping, or include other measurable targets. Others expressed concern that a numerical target could detract attention from those whose rough sleeping is hidden and potentially weaken political appetite to identify their needs. Some participants noted that many of the proposals included in Policy 7.2 are already underway, possibly indicating a lack of ambition on the part of the Mayor.

Providing pan-London leadership and coordination: Some participants suggested that, in providing leadership and coordination to efforts to support rough sleepers off the streets, the Mayor should:

- ask the No Nights Sleeping Rough Taskforce to establish sub-groups to identify new approaches to assisting the following groups:
 - non-EU nationals,

- those with offending histories, and
- those with support needs around substance misuse;
- draw into the Taskforce and its sub-groups smaller organisations, because they could bring to it greater creativity (This could involve them becoming members, or simply submitting evidence and making representations.);
- agree protocols with the Home Office and Police, to help reduce tensions between the Home Office and rough sleeping organisations; and
- seek to improve coordination between a number of different services, including substance misuse, the NHS, including mental health services, and Community Rehabilitation Companies. In relation to this suggestion:
 - Some participants expressed concern about whether mental health professionals were part of the No Nights Sleeping Rough Taskforce sub-group working on this issue.
 - Some participants recommended that the Mayor should seek to establish better links between prisons and homelessness services around prison discharge. They highlighted the range of difficulties that those leaving prison can face in securing accommodation, including some that stem from having had their benefits stopped while in prison. Some suggested a system whereby prisoners are helped to secure references for prospective landlords prior to being released, so that they can access accommodation more quickly.
 - Some participants highlighted how refugees can end up sleeping rough at the point when they leave National Asylum Seeker Support (NASS) accommodation and suggested that work could be done to prevent this.

Promoting opportunities for Londoners to make a difference: Participants warmly welcomed the strategy's commitment to promote opportunities for Londoners to make a difference to those sleeping rough. They felt that the considerable goodwill of the public on the issue of rough sleeping could be more effectively harnessed. Some participants made the following suggestions in relation to any publicity campaign:

- It should make best use of social media and technology. Participants cited the examples of the 'Big Change' campaign in Manchester and the Little Change Crowdfunding project.
- It should establish a GLA-branded, London-specific reporting tool.
- It should support 'TAP London', an initiative that employs young people who have experienced homelessness and installs contactless donation points around the city.
- The Mayor should actively discourage Londoners from giving to beggars.

Pan-London services for rough sleepers: Participants generally supported the commitment to fund and develop pan-London services for rough sleepers. They made the following comments in relation to this policy:

- They agreed that there is a clear need for a permanent base for No Second Night Out.
- Some participants expressed caution about services that reconnect rough sleepers, to other areas of the UK or to other countries.
 - They recommended that these services use checks to ensure that service users are not reconnected to places where they will be at risk.
 - Some questioned whether Safe Connections might end up duplicating the work of local outreach services.

- Although some participants welcomed the strategy’s recognition of the specific needs of non-UK nationals who sleep rough, others were not aware of it. Broadly, participants felt that the strategy should include clearer plans for meeting the needs of this group.
 - Some suggested that options such as hostels for those in work could be useful for nationals of other EU countries who sleep rough in London.
 - Some expressed concern about non-EU nationals, especially in view of cuts to social care services. Some suggested that the Mayor could help this group by promoting hosting schemes.
- Participants expressed the following concerns about Social Impact Bonds (SIBs):
 - that they can encourage “cherry picking”, creating a risk that they do not reliably meet the needs of the most entrenched rough sleepers;
 - that the outcomes set for the new GLA-commissioned SIB might unhelpfully simplify complex needs, and
 - that there is a lack of clarity around what support there will be for rough sleepers for whom the new GLA SIB service does not secure its target outcomes.
- Some participants were under the impression that Severe Weather Emergency Provision had ceased.
- Many participants were not aware of the Rough Sleeping Innovation Fund.
- Some participants noted the difficulty of getting through to StreetLink on the phone and felt that this suggests the service lacks adequate resources.
- Although they welcomed dedicated outreach provision for night transport as a step in the right direction, some participants commented that the services the Mayor commissions need to do more to identify and assist those who may not bed down in places where they can be readily located.
- Some participants suggested that the Mayor should fund mental health workers to operate within rough sleeping outreach teams.
- Some participants felt that those with experience of rough sleeping need to be more closely involved in designing and delivering the services that the Mayor commissions.

Accommodation provision for rough sleepers: Some participants suggested that the strategy should set out a clearer approach to accommodation pathways for those who have slept rough.

Developing and improving hostels: Most participants strongly supported the strategy’s commitment to invest in developing and refurbishing hostel accommodation. They highlighted the value of the facilities that this investment supports.

However, many participants also doubted that capital funding for new and improved hostels would be taken up without any provision for revenue funding. Some were concerned that capital investment would be wasted if hostels could not continue to operate. Some suggested that some of the capital funding the Mayor has made available should be converted into revenue funding.

Some participants questioned whether the £30 million earmarked for hostels within the Mayor’s Affordable Homes Programme is sufficient to meet London’s need for such accommodation.

Participants' other comments on this proposal included the following:

- There would be merit in selling some larger hostels and using the proceeds to invest in Housing First schemes.
- Accommodation services need to be closely and routinely linked with substance misuse treatment services.
- Accommodation services should focus on training and employment outcomes, as services for young people typically do. The Mayor might usefully collate and promote good practice in this area. However, some participants flagged the challenges associated with accommodating former rough sleepers who are in work.
- The allocation of funding should be determined by need, including the need for specialist accommodation provision – for example, for women. The Mayor could encourage the development of specialist provision by encouraging groups of boroughs to work together to support provision that it may not be practical to deliver at local authority level.

Hostel Clearing House: Some participants welcomed the proposed Hostel Clearing House, hoping that it might better coordinate the use of scarce hostel places. However, some participants felt that there were already adequate arrangements enabling local authorities and providers to make reciprocal agreements. Other participants felt that the rationale for this new service was unclear, given that there are very few voids in hostel accommodation.

Move-on accommodation: Participants welcomed the strategy's commitment to fund move-on accommodation. They highlighted the importance of preventing hostels from silting up. Participants also suggested that new provision will relieve reliance on existing private rented sector accommodation. (Some welcomed this because they had experiences of supporting service users who had been moved on from hostels into very poor-quality private rented accommodation.) In addition, participants raised the following questions and suggestions:

- Funding might be most effectively deployed in providing short-term move on accommodation, from which Londoners can be supported into work.
- The £50 million earmarked for funding in the Mayor's Affordable Homes Programme is not sufficient to meet London's need.
- Move on accommodation must be suitable for the needs of those moving on from hostels. For example, it should not consist of shared accommodation, which is often unsuitable for this group.
- Revenue funding is needed for move on accommodation. Some participants suggested that some of the capital funding available should be converted into revenue funding.
- The supply of move-on accommodation could be bolstered by requiring developers of new homes to provide units for this purpose through the planning system.
- Where move on accommodation is provided, there must be a recognition that many former rough sleepers can and do move backwards, as well as forwards, through accommodation pathways.
- The Mayor could prepare a compendium listing charitable bodies that provide grants to help those moving on – for example, by paying for white goods. Their number has reduced and, in some organisations that help people move on, staff have limited knowledge of those that remain.

Housing First: Participants suggested that the strategy should voice clear support for Housing First. They recommended that the GLA should support (a) Housing First initiative (s) in London,



potentially in conjunction with the Government and with a view to increasing the scale of such provision. Some participants from organisations that had operated Housing First schemes reported that they represented an effective form of provision for rough sleepers. Some highlighted the benefits of Housing First in terms of encouraging integration into wider communities.