# **GREATER LONDON** AUTHORITY

### **REQUEST FOR MAYORAL DECISION – MD3089**

Title: Data warehouse and other rough sleeping services

### **Executive Summary:**

The GLA plays a strategic leadership and coordination role in the rough sleeping sector in London. This Mayoral Decision seeks approval for receipt and expenditure of £200,000 from the Department for Levelling Up, Housing and Communities (DLUHC) across 2022–23 and 2023–24, to develop and administer a new data system which will allow decision makers to better understand the nature, and drivers of, rough sleeping in the capital, and target policies and resources more effectively to address it.

This Mayoral Decision also seeks approval for receipt and expenditure of £64,000 from the Office for Health Improvements and Disparities (OHID) to support the GLA's Migrant Health and Substance Misuse workstream. Additionally, approval is sought for expenditure of £100,116 to enhance the Rough Sleeping and Mental Health Programme (RAMHP), and for the reallocation of £120,000 underspend from Rough Sleeping Initiative (RSI) 2022–25 for the Subregional Immigration Advice Services' Accommodation Fund.

#### Decision:

That the Mayor approves:

- 1. receipt of £200,000 of funding from DLUHC, comprising £125,000 capital and £75,000 revenue
- expenditure of the above £200,000 as follows:
  - a. £125,000 of capital grant funding to London Councils for software purchase, developer time and other system build activities in 2022-23
  - b. £75,000 to meet the costs of exercising an option in the GLA's CHAIN contract with Homeless Link for staffing and system administration activities in 2023–24
- 3. receipt and expenditure of £64,000 of revenue funding from OHID in 2023-24 to extend the GLA's London Migrant Health and Substance Misuse post until 31 March 2024
- 4. expenditure totalling £27,361 on the following from the 2022-23 funding from OHID:
  - a. £20,000 in 2022-23 to procure guidance materials on eligibility for drug and alcohol services for people with unclear or limited entitlements.
  - £7,361 in 2022-23 to exercise an option within the GLA's training contract with Homeless Link to deliver training on eligibility for drug and alcohol services for people with unclear or limited entitlements
- 5. £100,116 of revenue grant funding in 2022-23 to South West London and St George's Mental Health Trust for their Rough Sleeping and Mental Health Programme (RAMHP).
- 6. reallocation of £120,000 underspend from RSI 2022-23's Youth Hub budget to be expended in 2022-23 as a variation to the GLA's existing grant to London Councils for its Subregional Immigration Advice Services' Accommodation Fund.

## **Mayor of London**

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Kudar

Signature:

Date: 7/3/23

#### PART I - NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR

## Decision required - supporting report

## 1. Introduction and background

- 1.1. During 2021-22, 8,329 people were seen sleeping rough in London. Of these, 61 per cent were new to the streets; 48 per cent were non-UK nationals; and 22 per cent were from Central and Eastern European countries. Seventy per cent had support needs, of which 50 per cent related to mental health; 31 per cent to alcohol; 34 per cent to drugs; and 35 per cent more than one of mental health, drugs and alcohol.
- 1.2. In his London Housing Strategy, published in 2018, the Mayor set out his aim that there should be a sustainable route off the streets for every rough sleeper in London. In June 2018, he published his Rough Sleeping Plan of Action which outlines the steps that need to be taken by City Hall, the government and others to achieve this. In 2021, the Mayor refreshed his Rough Sleeping Commissioning Framework, which sets out the overarching and crosscutting priorities that will underpin the GLA's commissioning activities over the three years from 2021 to 2024.
- 1.3. Since taking office, the Mayor has been expanding the pan-London rough sleeping services that the GLA funds and commissions. These services collectively form his Life off the Streets (LotS) programme. They are services for people with experience or at risk of sleeping rough, or initiatives to tackle rough sleeping, that cannot or would not be provided at a London borough level, as they are pan-London, or multi-borough, in their remit. Since 2016, the Mayor's Life Off the Streets rough sleeping services have supported over 13,500 people to leave the streets for good.
- 1.4. In 2022 DLUHC published a new strategy: 'Ending rough sleeping for good' this included a commitment to develop a new data-led framework to measure progress. The basis for this framework is a series of new Indicators to be collected nationally on a local and regional level. Greater London was one of a small number of areas selected as Early Adopters to design and trial the new Indicators. In partnership with London Councils, the GLA has worked with DLUHC and the Centre for Homelessness Impact to design the Indicators and operationalise them in London.
- 1.5. Some of the Indicators make use of existing systems and data and as such as already operational, however other key measures of progress require new data systems. In partnership with London Councils and other stakeholders, the GLA has designed a 'data warehouse' which will allow the capture and matching of homelessness-related data from multiple sources, enriching the understanding of homelessness, including its causes and interventions, in London.
- 1.6. In Autumn 2022 the GLA applied to DLUHC for funding to implement the data warehouse project, and in December 2022 DLUHC confirmed an allocation of £200,000 for the project.
- 1.7. MD3043 (sec 2.22) approved spend of £90,000 from the Mayor's Life off the Streets Programme budget to support the project management of the data warehouse project.
  - Rough Sleeping Drug and Alcohol Treatment Grant
- 1.8. Since Government launched their Rough Sleeping Drug and Alcohol Treatment Grant (RSDATG) 2022 to 2024, the GLA has been working with OHID (London) and City of London to coordinate a pan-London programme of work to improve access to drug and alcohol services for people who sleep rough. As part of this programme of work, the GLA secured £64,000 funding for a new 12-month, fixed-term Migrant Health and Substance Misuse Lead post and this expenditure was approved in MD2993.
  - Rough Sleeping and Mental Health Programme (RAMHP)
- 1.9. In February 2020, the GLA piloted the Rough Sleeping and Mental Health Programme (RAMHP) in four London Mental Health trusts over two years. Following the end of the pilot, all four projects

successfully secured support and funding from their local NHS systems. In May 2022 the GLA secured Government Rough Sleeping Initiative (RSI) 2022-25 funding to expand RAMHP into two additional Trust areas in the South of London (covering 8 boroughs). MD2993 approved expenditure of £1.34m of RSI funding for this work to transform mental health support for people sleeping rough.

London Councils: Subregional Immigration Advice Services (SIAS)

1.10. In 2022, the GLA and London Councils secured RSI 2022-25 funding for four specialist sub-regional immigration advice services in London for rough sleepers, and those at risk of rough sleeping, who need specialist support to clarify and/or regularise their immigration status. As part of this programme, £200,000 per year was secured for spot purchasing accommodation for those engaging in immigration advice as part of this programme. Funding was received by the GLA from DLUHC and paid on to London Councils. MD2993 approved expenditure of £4.93m (£1.23m in 2022-23, £1.91m in 2023-24 and £1.79m in 2024-25, see section 2.95 in the MD) to grant-fund London Councils to run a grant programme for these services between 1 July 2022 and 31 March 2025.

## Activity and Funding Profile

1.11. The newly approved expenditure will be spent as follows:

item	Item Source Recipient		2022-23	2023-24	
Warehouse build (capital funding)	DLUHC (2022-23)	London Councils	£125,000	£0	
Warehouse admin (revenue funding)	min DLUHC (2023-24) Homeless Link		£0	£75,000	
	subtotal for da	ta warehouse project	£125,000	£75,000	
GLA staffing	OHID (2023-24)	GLA	£0	£64,000	
Production of guidance materials	on of OHID (2022–23) Commissioned		£20,000	£0	
Training			£7,361	£0	
subtotal for Migrant Health and Substance Misuse project			£27,361	£64,000	
South West RAMHP	GLA core rough sleeping budget London and St (2022-23) George's Trust		£100,116	£0	
		subtotal for RAMHP	£100,116	£0	
SIAS - Accommodation fund	Reallocation of DLUHC RSI (2022- 23) funding (previously approved in MD2993)	London Councils	£120,000	£0	
		subtotal for SIAS	£120,000	£0	

#### 2. Objectives and expected outcomes

- 2.1. The Mayor's Life off the Streets programme focuses on achieving the Mayor's vision for everyone sleeping rough to have a sustainable route away from the streets. The programme is underpinned by the overarching priorities set out in the pan-London Rough Sleeping Commissioning Framework 2021, to work with boroughs and partners:
  - to minimise the flow of new rough sleepers onto the streets
  - to ensure that no one new to the streets sleeps rough for a second night
  - to ensure that no one lives on the streets of London
  - to ensure that no one returns to the streets of London.

2.2. Further details of the individual interventions for which this MD seeks approval are set out below:

#### Data warehouse project

CHAIN

- 2.3. The Combined Homelessness and Information Network (CHAIN) contract was awarded to Homeless Link and entered into following an OJEU procurement exercise to identify the provider. The contract began in April 2022. The initial contract value was £1.2m over three years (£0.4m per annum) and was approved under MD2789. Exercise of a contractual option with a value of £0.08m was approved by MD2957, and agreed in March 2022, to accept then newly announced government funding for short-term staffing. Exercise of a further contractual option was approved by MD3043 in December 2022, bringing the total current contract value to £1.38m.
- 2.4. CHAIN is the most complete source of data on a rough sleeping population within the UK. Commissioned by the GLA, and provided by Homeless Link since 1 April 2022, the CHAIN system is the main recording tool for all street-outreach services across London. It plays an important role in monitoring the work of on-street services; and the needs and outcomes for people they work with. CHAIN also produces regular published reports for the homelessness sector and the public.
- 2.5. The CHAIN contract allows the GLA to require Homeless Link to provide two kinds of optional services; general and specific. These options were set out in the initial procurement documents in clear, precise and unequivocal clauses. The option is being exercised in accordance with those clauses and at the price stated by Homeless Link for this option during the procurement exercise.
- 2.6. This MD seeks approval for expenditure of £75,000 of DLUHC funding in 2023–24 for the exercise of the GLA's contractual option for general services; in this case additional CHAIN staffing. This will enable the team to take-on the additional work of administering the new data warehouse system from 1 October 2023 to 31 March 2024.

## London Councils (LOTI)

- 2.7. The LotS group which is jointly chaired by the Deputy Mayor for Housing and Residential Development, and London Councils includes a data workstream that is tasked with considering the flow and use of data across the sector in London.
- 2.8. The LotS data workstream aims to improve the general data ecosystem to inform strategic decisions and improve operational delivery. This has recently expanded to include delivery of the government's new rough sleeping indicators in London.
- 2.9. The work of this group is led by London Councils and the GLA. Jointly with the London Office of Technology and Innovation (LOTI) (which is a specialist team within London Councils), the group has consulted with partners to develop the data warehouse project that will allow matching of non-identifiable data across multiple relevant systems to inform high-level strategic decisions.
- 2.10. This project will also enable the adoption and roll-out of the government's new rough sleeping indicators in London.
- 2.11. DLUHC funding of £125,000 will partially cover the cost of building and developing the new system, with London securing the remaining funding from London's local authorities.
- 2.12. London Councils and LOTI will oversee the procurement of a delivery partner to build the new system, and LotS will also manage delivery of the project.
- 2.13. This MD seeks approval for expenditure of £125,000 of DLUHC funding in 2022-23 by grant agreement to London Councils. This will partially fund the build and delivery of the data warehouse system by an external partner.

## Migrant health and substance misuse project

#### **GLA** staffing

- 2.14. In 2022, the GLA secured £64,000 from the Office for Health Improvements and Disparities (OHID) to fund a 12-month fixed-term London Migrant Health and Substance Misuse post. MD2993 approved this expenditure and the 12-month fixed-term post, which started in November 2022.
- 2.15. The post focusses on migrant health and rough sleeping, and aims to improve access to, and engagement with, substance misuse and health services for people with unclear or limited entitlements who are sleeping rough. This is done by working with national and regional partners to develop expertise across the sector and share best practice.
- 2.16. The GLA has secured a further £64,000 from OHID to extend and expand this work. This will enable the GLA to extend the London Migrant Health and Substance Misuse post until March 2024 at a cost of £64,000.
- 2.17. This MD seeks approval for expenditure of £64,000 of OHID funding in 2023-24 to extend the GLA's London Migrant Health and Substance Misuse post until 31 March 2024.
- 2.18. Appropriate approvals will also be sought in parallel through the GLA's Establishment Control process.

#### Guidance materials

- 2.19. In addition to extending the staffing post, £20,000 of the funding secured from OHID for 2022-23 will be used to commission a specialist organisation to produce guidance materials on eligibility for drug and alcohol services for people with unclear or limited entitlements. This is a complex policy area and, whilst there is guidance on NHS entitlements for migrants, this does not specifically cover drug and alcohol services or the specific needs/circumstances of people rough sleeping.
- 2.20. This MD seeks approval for expenditure of £20,000 of OHID funding in 2022-23 to procure guidance materials to support the migrant health and substance misuse project.

#### **Training**

- 2.21. The remaining £7,361 from 2022-23 OHID funding will be used to provide training aimed at frontline staff on eligibility for drug and alcohol services for people with unclear or limited entitlements.
- 2.22. The GLA has a contract with Homeless Link to deliver training. This service is currently funded through the Controlling Migration Fund until June 2023. MD2559 approved the delegation of authority to the Executive Director of Housing and Land, in consultation with the relevant Deputy Mayor, to approve funding allocations for additional specialist services and initiatives for non-UK nationals sleeping rough, up to a total of £1.9m. The current value of the Homeless Link training contract is £53,445. This contract includes an option to deliver additional training services.
- 2.23. This MD seeks approval for expenditure of £7,361 of 2022–23 OHID funding to exercise an option in the Homeless Link training contract to deliver additional training in 2022-23.

## Rough Sleeping and Mental Health Programme (RAMHP)

- 2.24. The GLA successfully piloted the Rough Sleeping and Mental Health Programme (RAMHP) in four London Mental Health trusts over two years. The programme helps people with mental health needs who are sleeping rough, or who have recently slept rough, to take a vital step towards a better quality of life by supporting access to mental health services. The pilot ended in March 2022, and the four projects have successfully secured support and funding from their local NHS systems.
- 2.25. There are now specialist mental health teams working with people who sleep rough in the majority of London boroughs. However, there are still two significant gaps in the South of London: the South

- West London and St George's Mental Health Trust area (Kingston, Sutton, Wandsworth, Richmond and Merton); and the Oxleas Trust area (Greenwich, Bromley and Bexley).
- 2.26. The GLA secured Government Rough Sleeping Initiative 2022-25 funding to expand RAMHP into these two Trust areas. The RAMHP model is for multidisciplinary teams based within the Trust to provide assertive outreach, working closely with local partners including outreach teams and local authorities. Service delivery of the new RAMHP teams is funded for two years, but this is an investment in system change, with the expectation that the local NHS Trusts funds these services after this initial two-year period as proven in other areas.
- 2.27. MD2993 approved expenditure of £1.34m of RSI funding for this work to transform mental health support for people sleeping rough in South London. Due to the high level of need in the South West London area, which has significantly increased since the GLA's RSI 2022–25 application, a further £100,116 is to be grant funded to South West London and St George's Mental Health Trust. This will enable the trust to ensure the RAMHP service has sufficient staffing cover within the service model to meet the demand in the region.
- 2.28. This MD seeks approval for expenditure of £100,116 by grant in 2022-23 from the Mayor's Life off the Streets Programme budget to expand South West London and St George's Mental Health Trust's RAMHP team.
  - London Councils: sub-regional immigration advice services
- 2.29. In total, the GLA secured £33.87m from the DLUHC in its successful RSI 2022–25 bid, for services running between 1 April 2022 and 31 March 2025. £30.38m of that amount was newly received RSI 2022–25 funding which was approved by MD2993, in addition to the £3.5m already approved by MD2957.
- 2.30. As part of the successful RSI 2022-2025 bid, the GLA secured funding for the Youth Hub, a pan–London service for 18-24 year olds, to provide age-appropriate, emergency accommodation with 24-hour on-site support for a range of levels and types of needs. MD2993 approved expenditure of £1.33m to grant-fund this service between 1 August 2022 and 31 March 2025. However, delays in securing the building for the Youth Hub have meant that the service was only able to start in Quarter 3 of 2022-23 and there has been an underspend of £158,000 this financial year.
- 2.31. DLUHC has confirmed that £120,000 of the Youth Hub's underspend can be reallocated to another RSI 2022-25 project to be spent within this financial year. Agreement has been reached that these funds would be most beneficial as additional funding for the GLA and London Councils' Sub-regional Immigration Advice Services' Accommodation Fund.
- 2.32. In 2022, the GLA and London Councils secured RSI 2022-25 funding for four specialist sub-regional immigration advice services in London for rough sleepers, and those at risk of rough sleeping, who need specialist support to clarify and/or regularise their immigration status. As part of this programme, £200,000 per year were secured for spot purchasing accommodation for those engaging in immigration advice as part of this programme. Funding was received by the GLA from DLUHC and paid on to London Councils. MD2993 approved expenditure of £4.93m (£1.23m in 2022-23, £1.91m in 2023-24 and £1.79m in 2024-25, see section 2.95 in the MD) to grant-fund London Councils to run a grant programme for these services between 1 July 2022 and 31 March 2025.
- 2.33. The Subregional Immigration Advice Programme's Accommodation Fund has already been oversubscribed this year, specially following the first two SWEP periods of the year as well the closure of Crisis at Christmas. The existing £200,000 Accommodation Fund for 2022-23 is already projected to overspend by £12,000 by end of February if the 38 rough sleepers currently accommodated by the fund stay in their placement until the end of February. Not all will be extended beyond the end of February but a proportion will be it is estimated that 10 being extended would require additional funds of £23,000. The remaining £85,000 would cover 15 additional step-down placements from winter provision. Reallocating £120,000 of the current RSI

- underspend to this fund would ensure that the Accommodation Fund can meet current demand and make a significant impact in line with the pan-London Rough Sleeping Commissioning Framework.
- 2.34. This MD seeks approval for the reallocation of £120,000 of 2022-2023 RSI underspend by way of a variation of the GLA's existing grant to London Councils to expand the Subregional Immigration Advice Programme's Accommodation Fund in 2022-2023. The variation will increase the amount of London Councils' existing grant from up to £4.93m to up to £5.05m.

### 3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010, as public authorities, the Mayor and the GLA are subject to a public-sector equality duty and must have "due regard" to the need to (i) eliminate unlawful discrimination, harassment and victimisation; (ii) advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and (iii) foster good relations between people who share a relevant protected characteristic and those who do not. Protected characteristics under section 149 of the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (all except the last being "relevant" protected characteristics). The equalities comments should specifically relate to the decision.
- 3.2. Of those seen sleeping rough in 2021-22:
  - 52 per cent were non-UK nationals
  - 6 per cent were from Gypsy/Romany/Traveller communities
  - 50 per cent had a mental health need
  - 17 per cent were women
  - 58 per cent were in the 26-45 age group
  - 8 per cent were under 26 years old
  - 12 per cent were over 55
  - 20 people were under 18.
- 3.3. Those with protected characteristics of race and disability are over-represented among rough sleepers. As the client group for these services is people with a history of sleeping rough, the proposals in this paper are likely to have positive impacts on Black, Asian and minority ethnic Londoners, and those with disabilities.
- 3.4. The data warehouse project will improve the availability and visibility of data concerning marginalised groups, and is designed to highlight gaps in service provision, it is therefore expected to have a positive impact on groups with protected characteristics.
- 3.5. The Migrant Health and Substance Misuse project is likely to have a positive impact on non-UK nationals who are rough sleeping. The project aims to improve drug and alcohol treatment outcomes for them by improving expertise across the sector and, where possible, addressing barriers to accessing services.
- 3.6. Similarly, the extension of the Subregional Immigration Advice Services' (SIAS) Accommodation Fund is likely to have a positive impact on non-UK nationals with immigration needs who are rough sleeping. This fund will provide accommodation for those who are engaging in immigration advice as a route off the streets and who, without this accommodation, would find it difficult to access any accommodation provision while they are working with their immigration advisers to resolve their cases.

3.7. The Rough Sleeping and Mental Health Programme (RAMHP) is likely to have a positive impact on people sleeping rough who have a disability. RAMHP aims to improve health and accommodation outcomes for people who are rough sleeping and have a mental health need, by providing accessible and flexible support from mental health professionals.

## 4. Other considerations

Key risks and issues

Risk description	Impact	Likelihoo	dMitigating action
CHAIN is unable to recruit sufficient staff to take on the warehouse project, resulting in no capacity to administer the system once it has been built and handed-over.	High	Low	The project is being planned with ample advanced notice, and in consultation with Homeless Link and the CHAIN team. Homeless Link already have a pool of suitable staff within the organisation. Alternative short-term arrangements with the external partner building the system will be agreed as a fail-safe option.
Completion of the build phase of the data warehouse slips, resulting in CHAIN staff being in post without a system to work on.	Low	Medium	Robust project management will be provided by LOTI, a team within London Councils which is very experienced in delivering similar projects.  The co-location of the data warehouse admin team within CHAIN will allow for flexible work across both systems, meaning that staff will be meaningfully employed in necessary tasks regardless of minor delays in system handover.
London Councils fail to secure funding from Local Authorities.	High	Low	Initial consultations and indications are that London local authorities are positive towards this work. Continued joint effort on the part of GLA and London Councils, and sponsorship of the LotS data group will make the case for project funding.
Migrant Health and substance misuse project — the GLA is unable to procure a suitable provider to complete the guidance materials within the timeframes.	High	Medium	Robust project management will ensure that procurement is completed before the end of the financial year. Although the market is small, there are a number of specialist organisations that are likely to be interested in bidding for the work.
South West London and St George's Trust are unable to recruit sufficiently skilled staff.	High	Low	The Trust is seeking advice from existing RAMHP teams on recruitment and will advertise roles internally and externally to maximise reach. The profile of the project within the Trust is expected to attract good candidates.
London Councils and their grant funded provider are unable to secure appropriate accommodation to spot purchase for the number of clients in need.	High	Medium	London Councils have been working with boroughs to expand on the supported accommodation options that are available for spot purchasing under this fund. In the last month there has been a significant increase in the spot purchasing options secured and a

	number of additional options are in the pipeline.

## Links to Mayoral strategies and priorities

4.1. The projects and services for which this Mayoral Decision seeks approval will help meet Policy 7.2 "Supporting Rough Sleepers off the Streets" of the Mayor's London Housing Strategy, through a range of actions to help meet the stated central aim of the Mayor "to ensure there is a route off the streets for every single rough sleeper in London". The GLA Rough Sleeping team works closely with partners in local authorities, London Councils, DLUHC and the charity sector to support rough sleepers off the streets, and provides pan-London leadership and coordination. The projects funded form part of proposal B of the same policy, which states:

"The Mayor will fund and commission a range of pan-London services and other initiatives to complement those provided by local councils. These will focus on identifying rough sleepers and intervening rapidly to support them off the streets, providing specialist support for particular groups, and helping rough sleepers stay off the street."

- 4.2. The projects funded through this Mayoral Decision will also help meet the objectives of the London Health Inequalities Strategy. Addressing homelessness and rough sleeping is one of the seven objectives set by the Mayor to achieve the aim that all Londoners benefit from an environment and economy that promote good mental and physical health.
- 4.3. As 50 per cent of individuals seen rough sleeping in London in 2021-22 had a mental health need, by support rough sleepers the services and projects funded by this Mayoral Decision will additionally meet Aim Two Healthy Minds of the London Health Inequalities Strategy.

## Impact assessments and consultations

4.4. The proposed projects have been developed in partnership with the Life off the Streets Programme and informed by consultation with stakeholders from London boroughs and voluntary-sector providers.

#### Conflicts of interest

4.5. There are no known conflicts of interest for those involved in the drafting or clearance of this report.

#### Subsidy control

South West London and St George's (SWLSTG) NHS Trust: Rough Sleeping and Mental Health Programme (RAMHP)

- 4.6. In regards to the grant to South West London and St George's (SWLSTG) NHS Trust for RAMHP, there is an equity rationale for this, as it is expected to improve accommodation and health outcomes for people who are sleeping rough and have a mental health need in five London boroughs. MD2993 approved grant funding of £680,000 to SWLSTG for RAMHP and this MD seeks approval for an additional £100,116 to enable the Trust to meet the increased need in the area. The funding will be granted to SWLSTG specifically to improve outcomes for people sleeping rough and who have a mental health need and is commensurate with the resources which they require for this purpose. Without this subsidy, the policy objective would not be achieved, as the South West RAMHP project would not be funded. The GLA will closely monitor the project to ensure that the grant be spent as agreed and that the project obtain the stated policy objective.
- 4.7. It is not believed that any less distortive means for achieving this policy objective is possible. It would not be feasible to achieve the same outcome through introducing ex ante competition for a contracted service or through utilising a different funding mechanism (e.g. a loan). There are two NHS Trust areas in London, which do not currently have a specialist mental health team: South West London and South East London. Both areas are receiving grant funding from the GLA (approved by

MD2993) for RAMHP projects. RAMHP projects need to be delivered by the local Mental Health Trust in order for the teams to be integrated within their mainstream services and systems. The people supported by RAMHP are homeless Londoners, who otherwise would not be able to afford to pay for mental health support on a market basis. Whilst the funding approved in this MD is from GLA core rough sleeping budget, the majority of the South West RAMHP project is funded from DLUHC and is part of a series of national grants to regional and local authorities and as such has minimal effect on trade between the regions of the UK. The grant would not affect international trade as there is no international market for the provision of these kinds of services to rough sleepers.

## London Councils: sub-regional immigration advice services

- 4.8. London Councils (LC) is an association of London boroughs which, among other things, undertakes pan-London projects. In 2022, the GLA and LC submitted a joint-bid for the Rough Sleeping Initiative (RSI) funding to DLUHC to deliver Subregional Immigration Advice Services (SIAS), including the accommodation fund available for those engaging in immigration advice. The bid was successful. Given that DLUHC cannot provide RSI funding directly to organisations other than boroughs and regional authorities, the GLA had to grant fund LC to act as a responsible body for providing grants to other bodies to deliver the programme sub-regionally. Subsidy control was considered then and it was concluded that the grant would not amount to an unlawful subsidy. The GLA was awarded the funding following its successful joint-bid with LC and the only reason LC was not the ultimate grantee was because of limits on the DLUHC's distribution of the RSI funding.
- 4.9. DLUHC has now agreed to the joint request from GLA and LC to allow for the reallocation of RSI underspend in the GLA budget for an uplift of the SIAS accommodation fund. Given LC has been acting as the responsible body for SIAS, approval is sought for the uplift to be grant funded to LC to continue to administer this fund. The grant to LC would once again not amount to an unlawful subsidy, as the grant continues to meet a policy goal in a proportionate manner and other less-distortive means would not be effective and would probably be much more costly e.g. creating a new procedure for a separate allocation of the funding, creating duplication and system inefficiencies. Finally, this grant affects neither international trade nor domestic trade, as the rough-sleeping services are provided locally and the market does not provide anywhere near enough of the required accommodation options for this target group at present.

### London Councils: LOTI

4.10. Mayoral approval is sought for expenditure of grant funding to London Councils for £125,000 for the data warehouse project. The £125,000 is funded from DLUHC and is part of a series of national grants to regional and local authorities and as such has minimal effect on trade between the regions of the UK. The project will improve the availability and visibility of data and is designed to highlight gaps in service provision across London. Without this subsidy, the policy objective would not be achieved and the project would not be funded. The grant funding provided by the GLA will be used by London Councils to competitively procure the project including, software purchase, developer time and other system build activities. As such the distortive effect on the market should be minimal. The GLA will closely monitor the project to ensure the grant be spent as agreed and that the project obtain the stated policy objective.

#### 5. Financial comments

- 5.1. Mayoral approval is sought for receipt and expenditure of £200,000 of funding from DLUHC, comprising £125,000 capital and £75,000 revenue. This funding is being approved to be spent as follows:
  - £125,000 of capital funding to oversee the procurement of a delivery partner to build a new data warehouse system

- £75,000 of revenue funding to Homeless Link for staffing and system administration activities in 2023-24.
- 5.2. Approval is also for receipt and expenditure of £64,000 of funding from OHID to be received in 2023–24 to extend the GLA's London Migrant Health and Substance Misuse post until 31 March 2024. As part of this approval is sought to spend 2022–23 OHID funding on the below:
  - £20,000 in 2022-23 to procure guidance materials on eligibility for drug and alcohol services for people with unclear or limited entitlements
  - £7,361 in 2022-23 to exercise an option within the GLA's training contract with Homeless Link to deliver training on eligibility for drug and alcohol services for people with unclear or limited entitlements.
- 5.3. Further approval is requested for expenditure of £100,116 by grant in 2022-23 to South West London and St George's Mental Health Trust for their Rough Sleeping and Mental Health Programme (RAMHP). This is to be funded from 2022-23 GLA core Rough Sleeping Programme budget.
- 5.4. Lastly approval is being requested to reallocate of £120,000 underspend from RSI 2022-23 budget previously approved in MD2993 to expend by grant in 2022-23 to London Councils for the Subregional Immigration Advice Services' Accommodation Fund.
- 5.5. The above receipt of funding and expenditure will be managed by Specialist Housing and Services Unit part of Housing and Land Directorate.

### 6. Legal Comments

### Power to undertake the requested decisions

- 6.1. The foregoing sections of this report indicate that the decisions requested of the Mayor concern the exercise of the Authority's general powers and fall within the Authority's statutory power to do such things considered to further or which are facilitative of, conducive or incidental to the promotion of social development within Greater London and in formulating the proposals in respect of which a decision is sought officers have complied with the Authority's related statutory duties to:
  - pay due regard to the principle that there should be equality of opportunity for all people
  - consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the United Kingdom
  - consult with appropriate bodies.
- 6.2. In taking the decisions requested, the Mayor must have due regard to the Public Sector Equality Duty; namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010, and to advance equality of opportunity between persons who share a relevant protected characteristic (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation) and persons who do not share it and foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149 of the Equality Act 2010). To this end, the Mayor should have particular regard to section 3 (above) of this report.

## Receipt of grant funding

6.3. Decisions 1 and 3 above seek approval of the receipt by the Authority of £200,000 of grant funding from DLUHC and £64,000 of grant funding from OHID. Officers are reminded to ensure that the GLA comply with conditions place upon the grant funding by DLUHC and OHID.

#### Provision of grant funding

6.4. Decisions 2(a), 5 and 6 above seek approval for the provision by the Authority of grant funding to London Councils and the South West London and St George's Mental Health Trust. The proposed grant to London Councils of up to £125,000 and the proposed variation of London Councils' existing grant from the Authority to increase it by £120,000 may be viewed as conditional gifts rather than a contract for services. Furthermore, the proposed £100,116 grant from the Authority to the South West London and St George's Mental Health Trust may also be viewed as conditional gift. Section 12 of the Authority's Contracts and Funding Code provides that decisions to award grant funding should generally be made on the basis of the outcome of a transparent, competitive application process. To this end, officers have set out at paragraphs 2.7 to 2.13, 2.24 to 2.28 and 2.31 to 2.34 above how they have met that requirement. Furthermore, officers must ensure that an appropriate funding agreement be put in place between the Authority and the various funding recipients before any part of the funding be paid.

## Subsidy control

6.5. The Subsidy Control Act 2002 requires that grant funding comply with its subsidy control principles. Officers have set out at paragraphs 4.6 to 4.10 above how the proposed grants comply with those principles. Finally, given that the value of each of the two propose grants and the value of the proposed variation of the existing grant exceeds £100,000, the officers must register each of the grants on the Department for Business, Energy & Industrial Strategy's Transparency Database.

#### Procurement

6.6. The officers must ensure that all procurements, which result from the approval of expenditure in this decision from, be undertaken in compliance with the requirements of the Authority's Contracts and Funding Code and that an appropriate contract be put in place between the Authority and the service provider or supplier before the commencement of the relevant services or the provision of supplies. To the extent that the officers propose to exercise an option under an existing contract—as in the case of the CHAIN contract at decision 2b above—the officers are reminded to comply with the contractual notice requirements under the relevant contract.

#### Extension of post

6.7. It should be noted that this decision relates only to the approval of budget although there is reference to approval also being sought for continued expenditure for the extension of one existing fixed-term post. Any staffing decisions that need to be made following this decision must be approved by the Head of Paid Service in accordance with the GLA Head of Paid Service Staffing Protocol and Scheme of Delegation.

#### 7. Planned delivery approach and next steps

Activity	Timeline	
Grant funding agreement between GLA and London Councils	March 2023	
for the data warehouse build	<b>A</b>	
Data warehouse build project	April 2023 – July 2023	
Data warehouse handover to CHAIN	October 2023	
Contract variation signed between GLA and Homeless Link for	June 2023	
CHAIN	≅	
Contract variation takes effect and CHAIN take-over new	October 2023	
system	10	
Procure guidance materials for migrant health and substance	February 2023	
misuse project		
Guidance materials are developed by commissioned provider	March – April 2023	

Contract variation signed between GLA and Homeless Link for additional training	March 2023
Grant funding agreement between South West London and St George's for expanded RAMHP team	March 2023
Grant funding agreement with London Councils for expanded SIAS's Accommodation Fund	February 2023

# Appendices and supporting papers: None.

#### Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note**: This form (Part 1) will either be published within one working day after it has been approved <u>or</u> on the defer date.

## Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? No

#### Part 2 - Sensitive information

Only the facts or advice that would be exempt from disclosure under FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form - NO

ORIGINATING OFFICER DECLARATION:	Drafting officer to confirm the following (✓)
Drafting officer:	
<u>Luke Oates</u> has drafted this report in accordance with GLA procedures and confirms the following:	•
Sponsoring Director:	2
<u>Tim Steer</u> has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.	*
Mayoral Adviser:	
Tom Copley has been consulted about the proposal and agrees the recommendations.	* //
Advice:	531
The Finance and Legal teams have commented on this proposal.	~
Corporate Investment Board	
This decision was agreed by the Corporate Investment Board on 20 February 2023	•

#### **EXECUTIVE DIRECTOR, RESOURCES:**

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

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D. Gene

#### Date:

01/03/2023

#### **CHIEF OF STAFF:**

I am satisfied that this is an appropriate request to be submitted to the Mayor

#### Signature:

D. Belleny

#### Date:

27/02/2023