GREATER LONDON AUTHORITY

REQUEST FOR MAYORAL DECISION - MD3350

Additional funding for Rough Sleeping programme

Executive summary:

The GLA commissions and grant-funds various pan-London rough-sleeping services. This MD seeks approval to: spend £20.4m from the GLA Rough Sleeping programme budget; and receive and spend up to £0.3m from London Councils.

This expenditure includes: £9.2m of the £10m additional funding committed by the Mayor to the core GLA Rough Sleeping Programme budget; and £11.2m from the existing GLA core programme, to spend on No Second Night Out (NSNO) – to be rebranded as 'Ending Homelessness Hubs' – and Homes off the Streets from 2025-26 to 2027-28, and Life off the Streets services in 2025-26.

The receipt and expenditure of this funding will support delivery of various projects providing accommodation and support to people who are at risk, or have a history, of rough sleeping across London. This expenditure is designed to support the strategic aims of the forthcoming Rough Sleeping Plan of Action, to prioritise prevention, partnership, and long-term solutions to rough sleeping. This will further the aim of the Mayor and the government to end rough sleeping in London.

Decision:

That the Mayor approves the following:

- 1. expenditure, from 2025-26 to 2027-28 of £7,729,198 revenue from the GLA Rough Sleeping programme budget:
 - a. £5,498,877 by way of the exercise of an option within the No Second Night Out contract with St Mungo's for an additional Hub and Staging Post
 - b. £2,200,000 for services under the Homes off the Streets initiative
 - c. up to £30,321 by way of a grant to Groundswell for support of the Lived Experience Advisory Group
- 2. expenditure of £10,500,000 in 2025-26 to 2027-28, from the existing GLA Rough Sleeping Programme budget for services under the Homes off the Streets initiative
- receipt of up to £300,000 grant funding from London Councils, and expenditure of same, in 2025-26, via an option in the Combined Homelessness and Information Network contract with Homeless Link to support the Strategic Insights Tool
- 4. expenditure of £2,215,753 on the GLA Rough Sleeping programme budget, to support services under the Homes off the Streets initiative and for small grants to support the Rough Sleeping Plan of Action
- 5. a delegation of authority to the Executive Director of Housing and Land in consultation with the Deputy Mayor for Housing and Residential Development to approve allocations of the £2,215,753 expenditure mentioned immediately above, without the need for a further decision form.

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.

Signature:	1	Date:	
No.	Jahrel	Irlshr	

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

Decision required - supporting report

1. Introduction and background

- 1.1. A total of 11,993 people were seen sleeping rough in London during 2023-24. This is a 19 per cent increase compared to 2022-23. Of these, 66 per cent were new to the streets, an increase of 25 per cent on the previous year. UK nationals accounted for 45 per cent, compared to 49 per cent in 2022-23. People from the 'rest of the world' outnumbered people from Europe (excluding the UK) for the first time in 2023-24: they made up 30 per cent of the whole, compared to 25 per cent from Europe.
- 1.2. In the 2018 London Housing Strategy, the Mayor set out the aim for a sustainable route off the streets for every rough sleeper in London. In June 2018 he published the Rough Sleeping Plan of Action, which outlines the steps that must be taken by City Hall, the government and others to achieve this aim. In 2021, the Mayor refreshed the Rough Sleeping Commissioning Framework, which set out the overarching and cross-cutting priorities that will underpin the GLA's commissioning activities from 2021 to 2024.
- 1.3. Since taking office, the Mayor has also been expanding the pan-London rough-sleeping services that the GLA funds and commissions. These services collectively forming the GLA Rough Sleeping programme are for people with experience, or at risk, of sleeping rough. They are initiatives to tackle rough sleeping that cannot or would not be provided at a London-borough level, as they are either niche or pan-London/multi-borough in their remit. Since 2016, the GLA Rough Sleeping programme has supported over 18,000 people to leave the streets for good.
- 1.4. In 2024, the Mayor announced his commitment to working with the government to set London on a course to end rough sleeping by 2030. The Mayor is publishing the new Rough Sleeping Plan of Action in Spring 2025, which will set the framework for achieving this goal to prevent rough sleeping wherever possible, and where it cannot be prevented making it brief and one-off. This Plan of Action will aim to bolster the strategic role for the Mayor in co-coordinating efforts in London, and prioritise interventions that prevent rough sleeping and provide long-term solutions away from the streets
- 1.5. The GLA Rough Sleeping programme is funded from core GLA budget, supplemented by various government grants, such as the Rough Sleeping Initiative (RSI). The following Mayoral Decisions (MDs) pertain to this programme:
 - MD2559 (March 2020) approved receipt and expenditure of £4.67m in government funding to expand various core services, and develop initiatives, for non-UK national rough sleepers.
 - MD2789 (March 2021) approved expenditure of £13.69m of GLA Rough Sleeping programme budget, to extend various core services up to March 2025; and £1.36m to continue grant-funding various projects. It also approved receipt and expenditure of £6.66m in government funding, which included continuing several RSI projects.
 - MD2853 (August 2021) approved receipt and expenditure of £24.55m in government funding, and expenditure of £0.17m of GLA Rough Sleeping programme budget, to fund various projects.
 - MD2957 (March 2022) approved receipt and expenditure of £3.65m in government funding, and expenditure of £3.85m of GLA Rough Sleeping programme budget, to fund various projects.
 - MD2993 (June 2022) approved the receipt and expenditure of £30.38m from the Department for Levelling Up, Housing and Communities' (DLUHC's) RSI.
 - MD3043 (December 2022) approved the receipt and expenditure of £0.54m in government funding, and expenditure of £1.25m of GLA Rough Sleeping programme budget, to fund various projects.

- MD3089 (March 2023) approved the receipt and expenditure of £0.2m from DLUHC's RSI, and expenditure of £0.1m of GLA Rough Sleeping programme budget, to fund various projects.
- MD3135 (June 2023) approved the receipt and expenditure of £3.61m from DLUHC's RSI, and £0.05m from DLUHC's Controlling Migration Fund; and expenditure of £16.36m from the GLA's Rough Sleeping programme budget to fund core services and various projects.
- M3161 (August 2023) approved the receipt and expenditure of £1.16m from DLUHC's RSI, and £0.14m from London Councils; and expenditure of £0.1m from the GLA Rough Sleeping programme budget, to fund various projects.
- MD3204 (December 2023) approved receipt and expenditure of £0.33m from the Royal Borough of Greenwich and the London Borough of Redbridge, to fund various projects.
- MD3241 (February 2024) approved receipt and expenditure of £1.5m from DLUHC's Winter Pressures funding, to fund various projects.
- MD3266 (June 2024) approved the receipt and expenditure of £0.1m from the London Borough of Redbridge, to fund various projects.
- MD3331 (February 2025) approved the receipt and expenditure of £20.53m from the Ministry of Housing, Communities and Local Government (MHCLG), and expenditure of £1.23m from the GLA Rough Sleeping programme budget. This included £736k to exercise options in the Combined Homelessness and Information Network (CHAIN) contract from 2025-26 to 2027-28.
- 1.6. Some of the services and interventions that are the subject of this decision form part of the GLA Rough Sleeping programme; and are extensions, expansions or continuations of services previously approved by the above MDs.
 - Life off the Streets (GLA Rough Sleeping) programme
- 1.7. A budget of £33.8m for the services that form the Mayor's Life off the Streets (LotS) programme was approved for the period 1 April 2016 to 31 March 2020 (see MD1532). A further £8.275m was approved in October 2020 (MD2620) to enable the core services to operate for a further year, to 31 March 2021. In addition, £13.69m was approved in March 2021 (see MD2789) to enable some core services to operate for another year; and to allow No Second Night Out (NSNO) and Routes Home to operate for an additional two years, to March 2023. A further £19.49m was approved in June 2022 (MD2993) to procure the Routes Home and Rapid Response services. In 2023-24 an additional priority investment of £2.1m was allocated to the Rough Sleeping programme budget.
- 1.8. There are currently seven LotS services under contract. New contracts for Migrant Accommodation Pathways Support (formerly Routes Home) and the Rapid Response Outreach Team (RROT) were the most recently awarded. These contracts began on 1 April 2023, following a successful procurement process approved by MD2993. New contracts for CHAIN, Clearing House, and the Tenancy Sustainment Teams (TSTs) North and South commenced in April 2022, following procurement approved in MD2789.
- 1.9. Procurement of the NSNO service was approved by MD3135, with the new contract commencing on 1 April 2024. MD3135 also approved the expansion of the RROT service with additional staff members until 31 March 2024.
- 1.10. Decision 5 above, seeks a delegation of authority to the Executive Director of Housing and Land to approve expenditure of £0.68m from the core GLA Rough Sleeping programme budget, without the need for a further decision form.
 - Additional £10m funding allocated to the GLA Rough Sleeping programme budget

- 1.11. The Mayor has committed an extra £10m revenue to the GLA Rough Sleeping programme budget over three years, to help achieve his commitment to ending rough sleeping in London by 2030. The additional funding commitment was formally announced on 29 January 2025 and will be used to meet some of the emerging priorities for the new rough sleeping Plan of Action, due to be published in April 2025.
- 1.12. MD3331 approved expenditure of £736k to expand the capacity of the CHAIN system to support the sector in meeting the 2030 target. This will allow us to take a data-led approach to our delivery, through enhanced strategic insights, and assessing the impact of our interventions to track progress on ending rough sleeping.
- 1.13. This decision seeks approval to spend the remaining £9.26m, out of the total £10m additional revenue.
- 1.14. The three emerging priorities for which expenditure is proposed are:
 - £5.5m to deliver an additional NSNO hub to be renamed 'Ending Homelessness Hubs' to match the number of sub-regions operating in Greater London; and test an approach to taking prevention referrals before someone has slept rough. This aims to remove the need for people to be 'verified' as rough sleeping before accessing support, while creating the conditions for stronger partnerships across all five sub regions.
 - £2.2m to increase the support available to people housed through Clearing House to be named Homes off the Streets by enhancing the service and increasing the intensity of support offered by the TSTs. This will support some additional tenancy sustainment in new homes we add to the scheme.
 - Up to £0.03m, via a grant to Groundswell, to support the Lived Experience Advisory Group. This
 group aims to ensure our interventions are person-centred and co-designed with people with
 direct experience to maximise their impact and mitigate unintended consequences. Alongside our
 investment in CHAIN this will provide the qualitative and quantitative data needed for a 'test
 and learn' approach.
- 1.15. The aim is to combine these revenue investments with additional capital investment, to allow a fifth hub to be procured, and to make available to refurbish and repair empty social homes to bring them into the Homes off the Streets initiative.
- 1.16. This decision seeks a delegation of authority to the Executive Director of Housing and Land to approve expenditure of the remaining £1.53m of the total £10m additional revenue from the GLA Rough Sleeping programme budget, without the need for a further decision form.

Activity and profile

- 1.17. This decision approves expenditure for multiple elements of the GLA Rough Sleeping programme.
- 1.18. The breakdown of this newly approved expenditure from the GLA Rough Sleeping programme budget is shown in the tables below:

Allocation of additional £10m

Item	Budgetary source	Transaction structure	2025-26	2026-27	2027-28	Total
NSNO	GLA core (additional £10m)	Contract	£598,877	£2,450,000	£2,450,000	£5,498,877
Homes off the Streets	GLA core (additional £10m)	Contract	£0	£1,100,000	£1,100,000	£2,200,000

Lived Experience Advisory Group	GLA core (additional £10m)	Grant-funding agreement	£30,321	£0	£0	£30,321
Unallocated amount	GLA core (additional £10m)	n/a				£1,534,802
SUBTOTAL – newly approved of the additional £10m			£629,198	£3,550,000	£3,550,000	£9,264,000
CHAIN (previously approved by MD3331)	GLA core (additional £10m)	Grant-funding agreement	£300,000	£218,000	£218,000	£736,000
TOTAL – full allocation of the additional £10m			£929,198	£3,768,000	£3,768,000	£10,000,000

Allocation of existing GLA core budget

Item	Provider	Funding source	Funding mechanism	2025/ 2026	2026/ 2027	2027/ 2028	Total Amount
Additional Small grants	ТВС	GLA Core	Grant funding agreements	£680,951.00	£0	£0	£680,951
Homes off the Streets	ТВС	GLA Core	Contract	£3,500,000	£3,500,000	£3,500,000	£10,500,000
Total		THE HATE	nd Blanking.	£4,180,951	£3,500,000	£35,000,000	£11,180,951

Allocation of external funding

Item	Provider	Funding source	Funding mechanism	2025-26	2026-27	2027-28	Total
CHAIN/S IT	Homeless Link	London Councils	Contract	£300,000	£0	£0	£300,000

2. Objectives and expected outcomes

2.1. The GLA Rough Sleeping programme has focused 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, and to be achieved by working with boroughs and partners.

2.2. These priorities are:

- to prevent people from sleeping rough
- to provide an immediate route off the streets
- to deliver sustainable accommodation and solutions for those leaving rough sleeping
- to ensure people have the support they need to rebuild lives.
- 2.3. The Rough Sleeping Plan of Action has consolidated these priorities into a framework which aims to ensure that rough sleeping is prevented wherever possible, and where it cannot be prevented that it is brief and not repeated. We will monitor progress on each of these indicators as a marker of success,
- 2.4. This is supplemented by a No Wrong Door principle, which aims to ensure that we maximise integration with the wider homelessness system, partnerships, and data-led approaches.

- 2.5. A key performance indicator for the GLA is that at least 85 per cent of rough sleepers who are supported by the GLA's rough-sleeping services do not return to the streets.
- 2.6. Further details of individual services and projects for which approval is sought under this decision are set out below.

Life off the Streets rough-sleeping services – exercise of contract options

No Second Night Out

- 2.7. NSNO supports people who are seen sleeping rough for the first time, or for whom a clear route off the streets has not yet been identified. The NSNO team assesses people's situation and makes offers of help, based on their specific circumstances and need; and supports them to take up that offer. The service is delivered across four pan-London NSNO 'Hubs', and these are complemented by self-contained interim accommodation known as a 'Staging Post' where people can stay until their move-on offer is available. Between July and December 2024, the service successfully accommodated or reconnected 667 people.
- 2.8. The service was procured in 2023-24, with approval in MD3135 for an initial period of three years, with an option to extend for up to a further two years (at one-year intervals). The NSNO contract was awarded to St Mungo's to begin in April 2024, following an OJEU procurement exercise to identify the provider. The initial NSNO contract value is £28.76m (up to £9.59m in each of 2024-25; 2025-26; and 2026-27). The total possible contract value over five years, if the contract was extended for a further two years and all contractual options to expand the service were exercised, is up to £47.93m (up to £9.59m in each of 2024-25; 2025-26; 2026-27; 2027-28 and 2028-29.) There are specific options within the NSNO contract to procure additional hubs and staging posts.
- 2.9. In line with the Mayor's objective to end rough sleeping in London by 2030, and to achieve a greater sub-regional preventative approach to tackling rough sleeping, it will be necessary to provide sufficient assessment and move-on resources in each of London's five sub-regions. Currently, the suite of four NSNO Hubs service all of London on a pan-London basis. A fifth Hub would enable the service to operate on a sub-regional basis; the service would also integrate much more closely with local authorities in their efforts to prevent and relieve rough sleeping. This new approach will rebadge the network of services as 'Ending Homelessness Hubs'.
- 2.10. Ending Homelessness Hubs, building on the success of NSNO, will aim to rapidly assess people and move them into accommodation. However, it will have more focus on supporting a joined-up approach from boroughs, to deliver effective homelessness prevention for single homeless individuals at risk of rough sleeping. This greater borough- and sub-regional-led approach will address the issue of people needing to sleep rough in order to access support. It will also provide an opportunity to address other associated systems challenges in each sub-region, with strategic oversight from the GLA.
- 2.11. The current NSNO contract contains an option for an additional Hub and Staging Post. This decision therefore seeks approval to spend up to £5.49m in revenue funding, for an additional Hub and Staging Post from January 2026 until March 2028, by exercising the aforementioned option in the NSNO contract. The option will be exercised in accordance with the requirements set out in the contract.
- 2.12. We aim to combine this revenue investment with additional capital investment, to allow us to procure a fifth hub.

Life off the Streets rough-sleeping services – procurement of new services

Homes off the Streets

2.13. The Mayor's Clearing House service coordinates a partnership of housing associations, rough-sleeping services, and charities, to provide access for people with a history of rough sleeping to roughly 3,500 ringfenced one-bed flats at social rent levels. Clearing House accepts referrals from a variety of hostels

- and outreach teams across London. It then works with its network of housing providers to match people with the appropriate homes and support via TSTs.
- 2.14. TSTs provide floating support to 2,000 people, at any time, who are living in Clearing House accommodation. TSTs provide open-ended support around: tenancy sustainment; access to employment; and securing positive moves to settled accommodation. This ensures permanent moves away from homelessness.
- 2.15. As a central pillar in his efforts to end rough sleeping in London by 2030, the Mayor has committed to expanding the Clearing House/TST scheme under the umbrella of his new Homes off the Streets initiative. This includes an ambition to double the number of homes available, to up to 7,000. Delivering this would require substantial government investment as well as partner engagement.
- 2.16. This will require re-procurement and a remodel of the existing Clearing House and TST services, and expansions of both. This will likely involve commissioning new types of support service alongside them, to include housing-led support models.
- 2.17. To achieve this ambition, the Homes off the Streets initiative will require substantial new investment from government, both capital and revenue.
- 2.18. To kickstart the Homes off the Streets initiative, and show City Hall's leadership, the Mayor has increased the level of funding available to expand these services. He has done so by combining existing budgets for Clearing House and TSTs with new funding from the additional £10m referenced in paragraphs 1.11 to 1.16.
- 2.19. The GLA aims to combine this revenue investments with additional capital investment, to make available capital funds to refurbish and repair empty social homes to bring them into the Homes off the Streets initiative.
- 2.20. This decision seeks approval to spend up to £12.7m in revenue from the GLA Rough Sleeping programme budget to commission coordination and support services under the Homes off the Streets initiative from 2026-27 to 2028-29. This comprises:
 - £2.2m over two years from the additional £10m funding referenced in paragraphs 1.11-1.16
 - £10.5m (£3.5m per year for three years), which is the existing budget for Clearing House and TSTs from the GLA Rough Sleeping programme budget.
- 2.21. This expenditure will be used to commission coordination and support services under the Homes off the Streets initiative during 2025-26. Service delivery is intended to start in Summer 2026.
- 2.22. Service design and specification activity will take place during 2025-26 to establish the exact model of support services, and the number and value of lots within this envelope.
- 2.23. This decision also seeks approval for delegated authority to the Executive Director of Housing and Land to approve:
 - allocations within this total envelope to individual projects
 - the award of contracts following competitive procurement processes for these services.

Life off the Streets rough-sleeping services – receipt of grant and exercise of contractual option CHAIN and the Strategic Insights Tool (SIT)

2.24. CHAIN is a database that holds information about people sleeping rough in London, as recorded by outreach teams and other rough-sleeping services across the capital. CHAIN data is used by services to record and inform the work they do; and by the GLA and local authorities to shape rough sleeping commissioning and strategies. Detailed data is published via dashboards and quarterly reports.

- 2.25. The CHAIN database is critical to delivering on-street services in London. It forms the basis of our understanding of the sector; and informs strategic needs assessment, the performance of interventions, and targeted service development. In light of these key functions, it is vital to ensure that this team is adequately resourced to meet the increasing demands that the development and implementation of the Plan of Action brings.
- 2.26. Following an open, competitive procurement process to identify the provider, in compliance with the GLA's Contracts and Funding Code, the CHAIN contract was awarded to Homeless Link and entered into on 1 April 2022. The contract had an initial term of three years, plus an option to extend the contract by up to three years; this option was chosen and approved in MD3331. The initial three-year contract value was £1.199m, approved by MD2789. To date, four variations to the contract have been executed, with a fifth variation pending, bringing the total contract value to £2,562,542.73.
- 2.27. In 2022, the LotS data workstream initiated a data-linking project, the Strategic Insights Tool (SIT). This project matches different data sets across multiple systems relevant to homelessness, to inform high-level strategic decisions.
- 2.28. In 2023-24 the GLA's CHAIN contract with Homeless Link was varied to fund Homeless Link to provide day-to-day administration support, user support, and system development to maintain and update the SIT.
- 2.29. Two previous MDs have approved receipt and expenditure of funds for this purpose:
 - MD3089 approved receipt of £200,000 from MHCLG (then DLUHC), comprising £125,000 capital and £75,000 revenue: and approved expenditure as follows:
 - £125,000 of capital grant funding to London Councils for software purchase, developer time and other system-build activities in 2022-23
 - £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
 - MD3161 approved receipt of £144,535 from London Councils, and expenditure to Homeless Link, for additional staffing to support the SIT in 2024-25. The funding was secured from the London Housing Directors' Group and received by London Councils, who granted it to the GLA.
- 2.30. There is still a requirement to maintain and develop the SIT. As such, this MD seeks approval to receive up to £300,000 from London Councils in 2025-26 and spend this in the same year. The CHAIN contract contains an option for the required services, including staffing and development costs. The option will be exercised in accordance with the requirements set out in the contract.
 - Life off the Streets rough-sleeping services grant funding
 - Groundswell Lived Experience Advisory Group
- 2.31. The Rough Sleeping Plan of Action aims to ensure that the voice of lived experience is at the core of our design and delivery, as part of our commitment to taking an evidence-based and person-centred approach.
- 2.32. Groundswell is a registered charity that exists to enable people experiencing homelessness to take more control of their lives; have a greater influence on services; and play a fuller role in the community. It has been creating innovative, client-centered services for over 20 years, focused on participation, research and health.
- 2.33. In October 2024, Groundswell set up a lived-experience steering group to provide guidance on the development and delivery of the Plan of Action; and to consult the GLA on the most effective way to involve people with lived experience of homelessness. Groundswell's work has been led by the

Groundswell Participation Team, who recruited 10 participants from diverse backgrounds and experiences. The Participation Team:

- offered training to support the steering group in building skills, confidence, knowledge, coproduction and participation
- established a process to connect the lived-experience steering group with GLA members who are leading the development of the Plan of Action
- provided recommendations for how the steering group can be involved in ongoing development and delivery of the Plan of Action.
- 2.34. Groundswell initially received £9,660, for the period covering November 2024 to March 2025, to set up the lived-experience steering group. As the Plan of Action specifically aims to recognise and prioritise the role of lived-experience expertise in directing strategy and implementation, the GLA would like to continue the participation of Groundswell's lived-experience steering group both in the context of the Rough Sleeping Plan of Action, and beyond this.
- 2.35. This decision seeks approval to spend £0.03m from the core GLA Rough Sleeping programme budget, to grant-fund Groundswell to support the Lived Experience Advisory Group with their role in delivering the new Rough Sleeping Plan of Action from 2025-26.

3. Equality comments

- 3.1. Under section 149 of the Equality Act 2010, as public authorities, the Mayor and the GLA are subject to the Public Sector Equality Duty, and must have "due regard" of the need to:
 - eliminate unlawful discrimination, harassment, and victimisation
 - advance equality of opportunity between people who share a relevant protected characteristic and those who do not
 - foster good relations between people who share a relevant protected characteristic and those who do not.
- 3.2. Protected characteristics under section 149 of the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or believe, sex, sexual orientation, and marriage or civil partnership status (all except the last being "relevant" protected characteristics).
- 3.3. Objective 3 of the Mayor's equality, diversity and inclusion strategy, Inclusive London, is to "address the specific barriers that prevent some rough sleepers exiting rough sleeping and rebuilding their lives".
- 3.4. The funding referenced in this decision will help to tackle the inequalities experienced by certain groups of Londoners most affected by homelessness and rough sleeping. The most recent data from CHAIN for 2023-24 indicates that, of those seen sleeping rough:
 - 59 per cent were non-UK nationals (including 'not known')
 - 24 per cent were Black or Black British
 - 4 per cent were Roma
 - 48 per cent had a mental health need
 - 16 per cent were female
 - 59 per cent were aged 26-45

- 10 per cent were under 26
- 12 per cent were over 55.
- 3.5. Homelessness in London, and specifically rough sleeping, disproportionately affects people with certain protected characteristics. Increasing the provision of preventative homelessness interventions will help to achieve positive impacts in line with the need to eliminate discrimination, harassment and victimisation.
- 3.6. The allocation of funding in this decision is aimed at implementing the Mayor's policies set out in the London Housing Strategy. In May 2018, the GLA published an equality impact assessment (EIA) of that strategy. It included policies related to tackling homelessness and helping rough sleepers, to which this service will contribute. The EIA concluded that taking measures to support people sleeping rough off the streets, and to help them avoid returning, means rough sleepers will be removed from the acute risk and social isolation that sleeping rough creates. This will benefit those with certain characteristics, whom the baseline for the EIA identified as disproportionately more likely to be seen sleeping on London's streets.
- 3.7. Several of the interventions for which this decision seeks approval will specifically benefit particular marginalised or disadvantaged groups. For example, Welfare to Wellbeing supports homeless veterans; and Anira House is run by and for members of the LGBTQ+ community. Other interventions, such as HHPA and Mental Health Assessment and Support, address specific needs that are more likely to be experienced (and unmet) by those experiencing homelessness.

4. Other considerations

Key risks and issues

4.1. The key risks associated with the decisions in this MD are outlined in the table below:

Risk description	Impact	Likelihood	Mitigation
CHAIN/SIT: Cannot mobilise by 1 April 2025, as specialist skills need to be recruited.	Low	Medium	Communicate requirements with Homeless Link early; and explore an early start to recruitment processes. Consider possible flexibility of delivery plan. Prioritise deliverables.
We cannot open the new NSNO hub by January 2026. This may be due to capacity constraints in GLA or St Mungo's staffing; or the difficulties of finding and potentially refurbishing the right building in time.	Medium	Medium	Once confirmed, this will be a priority for GLA staff. There is dedicated resource in place for finding the right capital opportunity. GLA officers will keep senior colleagues regularly updated on progress towards this target, including if a delayed opening becomes likely, to ensure any reputational risk is minimised.
An increased focus on prevention leads to increased overall demand that Veterans Aid could struggle to meet.	Medium	Low	GLA to review demand in monitoring meetings with Veterans Aid. Make it clear in the funding agreement that the funding is a contribution to the work and will not meet all needs of the client group.
Insufficient GLA staff resources to develop, deliver and monitor the new services and	High	Low	There are dedicated GLA leads for each service. All services are monitored through quarterly formal reporting and more frequent meetings, as well as occasional audits.

projects will reduce the effectiveness of current services, so that new services are not developed or delivered effectively. There is a potential risk to the clients' safety if services are poorly designed and delivered, or providers are not effectively monitored.			
The providers perform poorly, hampering achievement of key mayoral objectives and more detailed service specific KPIs.	Medium	Low	A robust contract and a rigorous contract- monitoring process by the GLA will ensure that poor performance is identified and rectified quickly and appropriately.
The nature of rough sleeping changes, making the services and projects less relevant.	Medium	Low	The GLA Rough Sleeping team constantly monitors the rough-sleeping landscape, through detailed quarterly CHAIN reports; and strategic and operational interactions with key stakeholders from, among others, boroughs, service providers and central government.
The numbers of people seen sleeping rough changes to the point where services are no longer appropriate at the scale envisaged.	Medium	Low	The GLA Rough Sleeping team constantly monitors the rough-sleeping landscape, through detailed quarterly CHAIN reports; and strategic and operational interactions with key stakeholders from, among others, boroughs, service providers and central government.

Links to Mayoral strategies and priorities

4.2. The projects and services for which this MD seeks approval will help meet Policy 7.2, "Supporting Rough Sleepers off the Streets", of the Mayor's London Housing Strategy. This will occur 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, the DLUHC and the charity sector to support rough sleepers off the streets; and provides pan-London leadership and coordination. The services and 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."

4.3. The projects and services funded through this MD 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 an economy that together promote good mental and physical health.

Conflicts of interests

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

Subsidy control

- 4.5. If approved, in accordance with decision 1c, above, Groundswell will receive funding from the GLA for its Lived Experience Advisory Group. GLA officers have analysed the proposal against the Statutory Guidance for the UK Subsidy Control Regime. They have assessed that the Subsidy Control Regime is non-applicable in these circumstances, because the proposed financial assistance does not constitute a subsidy.
- 4.6. In particular, the proposed financial assistance fails to satisfy Limb B of the four-limbed test set out in the Subsidy Control Act 2022 (SC Act), as Groundswell is not classed as an enterprise.
- 4.7. The proposal is consistent with the example set out in section 2.17 of the Statutory Guidance. This example states that "a ringfenced grant to a charity for its non-economic activities (even if the charity also provides some goods or services on the market)" is unlikely to meet the four-limbed test.
- 4.8. If further funding is awarded under the delegations approved by this MD, GLA officers will assess the proposal against the Statutory Guidance for the UK Subsidy Control Regime, applying the four-limbed test set out in the SC Act. In case the proposal satisfies each limb of the four-limbed test, officers will assess the proposed subsidy against the seven subsidy control principles.

5. Financial comments

- 5.1. Mayoral approval is sought for expenditure totalling £20,444,951 from GLA core Rough Sleeping programme budget (see first two rows in the table below and under paragraph 1.18 above). Approval is also requested for receipt and expenditure of up to £300,000 grant funding from London Councils in 2025-26, for an option in the CHAIN contract with Homeless Link to support the SIT.
- 5.2. Approval for a delegation of authority to the Executive Director of Housing and Land to approve allocations of the £2,215,753 expenditure from the additional £10m on the GLA Rough Sleeping programme budget (see second row in the table below) is also sought to support services under the Homes off the Streets initiative.
- 5.3. The profile and funding of the expenditure totalling £20,744,951 that is outlined in this MD is provided in the table below and in the table under paragraph 1.18 above.

Budget and Funding	2025-26	2026-27	2027-28	Total
GLA Rough Sleeping core revenue Programme budget	£4,180,951	£3,500,000	£3,500,000	£11,180,951
Additional £10m growth revenue budget (part of 2025-26 budget setting)	£629,198	£3,550,000	£5,084,802*	£9,264,000
London Councils funding	£300,000	-	-	£300,000
Total	£5,110,149	£7,050,000	£8,584,802	£20,744,951

^{*£2,215,753} of this is to be delegated to Executive Director of Housing and Land to approve therefore allocation and profiling for this will be approved under separate approvals.

- 5.4. The budget for GLA Rough Sleeping programme is included in the 2025-26 to 2027-28 budget. However, this is subject to final budgets being approved for these years. Therefore, to mitigate against risk of insufficient funding, a break clause should be included in the contracts being funded from the GLA programme budget, should funding change for future years.
- 5.5. These contracts, funding and programmes are managed by the Rough Sleeping team, part of the Specialist Housing Services unit within Housing and Land. This programme and budget is part of the proposed Accommodation and Wider Support for Those Who Need It Most programme.

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 GLA's general powers, and fall within the GLA's statutory power to do such things considered to further or that are facilitative of, or conducive or incidental to, the promotion of social development within Greater London. In formulating the proposals in respect of which a decision is sought, officers have complied with the GLA'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.

Exercise of options

- 6.3. Decision 1, above, seeks approval of the expenditure of £5,498,877 by way of the exercise of an option within the GLA's NSNO contract with St Mungo's for an additional Hub and Staging Post. Regulation 72(1)(a) of the Public Contracts Regulations 2015 provides that a contract may be modified within its term, where the contract contains an option, provides a mechanism for exercising the option and where the services fall within the scope of the option. Officers have set out at paragraphs 2.7 to 2.12, above, how these requirements have been met.
- 6.4. Decision 3, above, seeks approval to receive up to £300,000 grant funding from London Councils, and spend the same, in 2025-26, by way of the exercise of an option in the GLA's CHAIN contract with Homeless Link to support the SIT. The requirements of 72(1)(a) apply equally to the exercise of the option in the GLA's CHAIN contract with Homeless Link. Officers have set out at paragraphs 2.24 to 2.30, above, how the requirements have been met.

Procurement

6.5. Decisions 1.b., 2 and 4, above, seeks approval to spend a total of £14.23m for the Homes off the Streets initiative. Officers are reminded to comply with the GLA's Contracts and Funding Code when they procure any services or supplies; or where they award grant funding in furtherance of the Homes off the Street initiative.

Receipt of funding from London Councils

6.6. Decision 3, above, seeks approval of the receipt of up to £300,000 in grant funding from London Councils. Officers are reminded to comply with any conditions placed upon the use of the grant funding by London Councils.

Grant funding to Groundswell

6.7. Decisions 1c, above, seeks approval of up to £0.03m by way of a grant to Groundswell for support of the Lived Experience Advisory Group. Grant funding is required to be conditional gift rather than a

contract for services. Officers have set out in paragraphs 2.31 to 2.35, above, how the proposed grant funding to Groundswell meets that requirement. Furthermore, officers must ensure that an appropriate funding agreement is put in place between the GLA and the various proposed grantfunding recipients prior to the payment of any of the proposed grant funding.

Subsidy control

6.8. The SC Act requires that grant funding is assessed in relation to its four-limbed test. Officers have made this assessment at paragraphs 4.5 to 4.8, above, and have concluded that the proposed funding does not meet Limb B of the four-limbed test. Accordingly, officers do not consider that the proposed grant-funding amounts to a subsidy for the purposes of the SC Act.

Delegation

6.9. Decision 5, above, seek a delegation from the Mayor to the Executive Director of Housing and Land. Any function exercisable by the Mayor on behalf of the Authority may also be exercised by any member of GLA staff, to the extent that the Mayor authorises and subject to any conditions that the Mayor sees fit to impose. To this end, the Mayor may make the requested delegation to Executive Director of Housing and Land if he so chooses.

7. Planned delivery approach and next steps

7.1. The planned delivery approach for each of the interventions within this MD is set out in the tables below:

Life off the Streets rough-sleeping services - grant funding

Lived-experience steering group, Groundswell

Activity	Timeline
Grant agreement signed; and delivery start and end date decided	April 2025 – March 2026

Life off the Streets rough-sleeping services-external grant/contract variation

CHAIN

Activity	Timeline
Preparation of variation to contract	1 February 2025
Variation signed	31 March 2025
Delivery start date	1 April 2025
Delivery end date	31 April 2026

Life off the Streets rough-sleeping services - exercise of contract options

NSNO

Activity	Timeline
Exercise of contract option for Additional Hub and Staging Post	April-June 2025
Procurement and mobilisation of building(s)	July-December 2025
Delivery start date	January 2026
Delivery end date	March 2028

Homes off the Streets

Activity	Timeline
Service design and consultation	February-July 2025

Procurement	September 2025-March 2026
Delivery start date	July 2026

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 be published either within one working day after it has been approved or on the defer date.

Part 1 - Deferral

Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: To align with the publication of the new Rough Sleeping Plan of Action, due early May 2025.

Until what date: 23 May 2025

Part 2 - Sensitive information

Only the facts or advice that would be exempt from disclosure under the 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: David Eastwood has drafted this report in accordance with GLA procedures and confirms the following:	✓
Sponsoring Director: <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: The Finance and Legal teams have commented on this proposal.	✓
Mayoral Delivery Board This decision was agreed by the Mayoral Delivery Board on 17 March 2025.	√

CHIEF FINANCE OFFICER:

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

Signature

Date

fay lannal

17/03/2025

CHIEF OF STAFF:

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

Signature

Date

17/03/2025

D. Belling