

Our reference: MGLA220425-4473

Date: 18 June 2025

Thank you for your request for information which the Greater London Authority (GLA) received on 22 April 2025.

Your request has been considered under the Freedom of Information Act 2000.

You requested:

Please provide me with the service agreements for the two services that you commission at [information redacted for security purposes] Lewisham site.

Additionally, please also provide details and information for how this service and process is reviewed, either annually or less frequently. I am specifically concerned with how success is measured.

Finally, please also provide information about the other homelessness services you commission within Hither Green, Catford and Lee. I do not require the service agreements for these, but would like location, size and nature of each provision.

You clarified:

- 1. The particular service that is provided for, including duration of client stays, nature of need, levels and types of support provided,*
- 2. Any information in this document that relates explicitly to the [information redacted for security purposes] site - I assume there will be some site specific stipulations or particulars in here, including maximum service user numbers, for example*
- 3. Any information pertaining to the user agreement between service provider and service users*
- 4. Any information pertaining to the responsibility of the service provider to the local community, including around social and antisocial behaviour*

Our response:

I can confirm that the GLA holds information within the scope of your request.

Service Agreement:

The GLA commissions a 'hub' and a 26 bed 'staging post' in Lewisham and these form part of a service called No Second Night Out (NSNO).

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While we do not have a service agreement for the hub and staging post in the area you mentioned, we do have an overall contract for *No Second Night Out*.

No Second Night Out (NSNO) aims to provide an immediate route off the street for people sleeping rough, a comprehensive assessment of their needs and circumstances, and intensive specialist support to secure an onward move out of rough sleeping. The service is a pan-London project, meaning it takes referrals from outreach teams across London.

The model consists of four assessment hubs with space for up to 15 people in each hub at any one time who stay there while the team work to rapidly identify a route off the street. In addition to this, 106 staging post rooms provide accommodation for people who have been assessed at a hub and need a little longer to secure their onward accommodation. Out of this provision, one hub and a 26-bed staging post is in Lewisham.

The relevant sections are listed:

Schedule 3 – specification

- Appendix I – [Location redacted] Hub Heads of Terms
- Appendix J – [Location redacted] Staging Post Heads of Terms
- Appendix L – [Location redacted] Floor Plan
- Appendix M – [Location redacted] Floor Plan
- Appendix N – [Location redacted] Floor Plan

We also hold a copy of two additional documents which include some elements that fall in scope of your request:

- *ITT (Technical response)* sections 1.1, 2.1, 2.2, 3.2 and 5.2 related to the types of support provided and service model; and
- a related *Clarification Questions* document.

Please find attached the information we hold within the scope of your request.

Within the documents, we have withheld the locations of the hubs and staging posts under Section 38 of the FOI Act (Health and safety). We have withheld some information which is commercially sensitive from release under the provisions of Section 43 of the Act. Additionally, some of the information where it relates to floor plans is withheld in full under the provisions of both Section 43; Section 38 and Section 31 of the Act (prevention of crime).

Further information about how these exemptions have been engaged can be found in Appendix A at the end of this letter.

Service reviews:

The service provider, St Mungo Community Housing Association (St Mungo's), submits monitoring reports every three months and contract monitoring meetings are held every three months. These meetings cover service performance, service developments and partnerships, staffing, and serious incidents and safeguarding. GLA and the service provider add additional items to the agenda as relevant.

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The service is monitored against the following key performance indicators:

KPIs	
Assessment	100% of people have an initial risk and support needs assessment undertaken and recorded in the assessment hub
	100% of people with unclear or limited entitlements in the UK are provided with initial immigration advice at the assessment hub
	90% of people are given a move-on plan at the assessment hub
Outcomes	70% of people have a successful accommodation or reconnection outcome at their departure from NSNO
	<15% of people departing NSNO return to rough sleeping within 90 days of leaving the service
	<10% of people abandon the assessment hub
Move on times	90% of departures from the staging post are planned moves
	80% of people move on from the assessment hub within 7 days
	The average length of stay in a hub is less than 10 days
	70% of people move on from a staging post within 42 days
	The average length of stay in a staging post is less than 56 days
	The average length of stay in the immigration advice bedspaces is less than 90 days
	Long stay reviews completed and recorded for 100% of those in the hub for 7+ days, staging post beds for 42+ days and immigration advice beds for 90+ days

In relation to the last part of your request, we can confirm that the GLA does not commission other homelessness building based services within Hither Green, Catford and Lee. The GLA does commission a range of services that operate across London. More information on these can be found here: <https://www.london.gov.uk/programmes-strategies/housing-and-land/mayors-priorities-londons-housing-and-land/homelessness/rough-sleeping>

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA220425-4473.

Yours sincerely

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at: <https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Appendix A

Health and safety

Some of the information you requested is exempt from disclosure under Section 38(1)(a) and (b) (Health and safety) of the FoIA, specifically the addresses and locations of the accommodation.

Section 38(1) of the Act states that:

(1) Information is exempt information if its disclosure under this Act would, or would be likely to

(a) endanger the physical or mental health of any individual, or

(b) endanger the safety of any individual.

The information withheld from disclosure relates to the names and locations or other identifiable information relating to these sites.

Section 38(1)(b) of the Act is duly engaged because of the potential risk to public safety as set out in the Act. Londoners sleeping rough are particularly vulnerable, and their safety may be more easily endangered by others.

The GLA is mindful of releasing information into the public domain relating to the location and identifiable features of the accommodation where there is a likelihood that Rough sleepers would be singled out for harassment, intimidation and possible violence by others. This information has been withheld to protect the staff and customers of the accommodation whereby there is the potential for persons with ill intent to target these locations¹. On more than one occasion far right groups have attempted access to St Mungo's buildings where people experiencing homelessness are accommodated.

Section 38(1) is a qualified exemption. The Act provides that a public authority must weigh the public interest in maintaining the exemption against the public interest in disclosure. Under FoIA, the 'public interest' is not the same as what might be of interest to the public. In balancing the public interest in disclosure, we consider the greater good or benefit to the community as a whole if the information is released or not. The 'right to know' must be balanced against the need to enable effective government and to serve the best interests of the public.

There is a clear public interest in the release of information that helps demonstrate the work of public bodies involved in helping vulnerable members of society. To help facilitate this understanding, there is a justifiable public interest in placing into the public domain information that would allow the public to assess the nature of the assistance in place, and related costs. Transparency around these arrangements will generate confidence in the integrity of the processes involved. This interest is partially met by the disclosure of the costs and the remainder of the information requested.

The GLA is also mindful of the assumption in favour of disclosure in 2(2)(b) the FOIA. Conversely the disclosure of this same information would be likely to increase the risk of

¹ [Britain First is raiding homeless hotels to harass asylum seekers \(thelondoneconomic.com\)](https://www.thelondoneconomic.com/news/britain-first-raiding-homeless-hotels-to-harass-asylum-seekers)
& [Violent crowds hurl missiles, set fires and target hotels \(BBC.co.uk\)](https://www.bbc.com/news/uk-politics-55888888)

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incidents (as evidenced in the media) if made public and seen by those intent on causing harm. It is not in the public interest to release information that could be directly used to harm or plan harm to the public.

Once section 38 is engaged and it has been established that there is a real and actual danger to someone's health and safety, it is difficult to find favour in disclosure. The information withheld from disclosure is not key to understanding the overall allocation and expenditure. We have determined that safeguarding the safety of the public attending the events is of paramount importance and the public interest favours maintaining the exemption provisions of s.38(1)(b) in relation to the redacted and withheld information.

ITT (Technical response) & Clarification Questions document.

These documents contain some information that is exempt under Section 38(1) as described above.

Section 43(2) exempts information whose disclosure would, or would be likely to, prejudice the commercial interests of any legal person (an individual, a company, the public authority itself or any other legal entity).

We consider that this information to be commercially sensitive and exempt from disclosure under s.43 of FOIA. If the bid submission and responses to clarification questions were to be disclosed, we consider that it would, or would be likely to, prejudice St Mungo's commercial interests. It would prejudice St Mungo's competitive advantage as they include information regarding current models and service delivery details that are unique to St Mungo's and have been developed using their knowledge and experience of the sector and delivering these types of unique services. In addition, they contain information on their pricing structure and costings.

St Mungo's does not routinely publish this information or allow its disclosure to third parties and disclosure of this information may result in their unique practices and pricing structure information becoming public and accessible to their competitors. This will give them unfair advantage when bidding for contracts in the near future, severely prejudicing St Mungo's negotiating ability within a competitive market place.

Having considered this and given that disclosure under FOIA is disclosure "to the world", we consider the risk of prejudice to St Mungo's commercial interests to be real and significant, that the disclosure will undermine fair competition and that it is appropriate to withhold this information.

The GLA recognises the legitimate public interest in the transparency of information related to services for which public funding is awarded. In balancing the public interest in disclosure, we consider the greater good or benefit to the community if the information is released or not. The 'right to know' must be balanced against the need to enable effective government and serve the best interests of the public. In this case, it is felt that the public interest would not be met by revealing information which would be likely to be detrimental to the way in which St Mungo's negotiates on other contracts and procurement activity.

Floor plans

This information is withheld under Section 31(1)(a), Section 38(1)(b) and Section 43(2)

31. —(1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice -

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(a) the prevention or detection of crime,

We consider Appendix L, M and N (Floor Plans) to be commercially sensitive and exempt from disclosure under s.43 of FOIA. If the floor plans were disclosed, we consider that it would, or would be likely to, prejudice St Mungo's commercial interests whilst also pose a risk to the health and safety of their staff and clients.

Floor plans contain critical details about the building's layout, security measures, and entry/exit routes. Their disclosure would allow individuals to exploit this information, increasing health and safety risks.

Releasing floor plans poses tangible threats, including exposure of the service, staff, and vulnerable clients to security breaches such as break-ins, theft, targeted attacks, vandalism, or unauthorized access.

Additionally, disclosure would compromise safety measures by revealing sensitive layouts—including access points and emergency exits—making them vulnerable to tampering or obstruction, which could put lives at risk. Public availability of such information may also enable targeted threats against clients, further escalating the likelihood of harm.

Section 31(1)(a) covers all aspects of the prevention and detection of crime and can apply to information relating to building schematics and designs.

Section 31(1)(a) of the Act is engaged because the release of this information would, or would be likely to, prejudice the prevention or detection of crime. The provisions and Section 31(1)(a) of the Act are engaged by information which could be used by those intent on committing criminal acts. The information would make the premises vulnerable to burglaries, vandalism, attacks, or other crimes.

Section 38(1)(b) of the Act is also duly engaged because of the potential risk to public safety related to this, as set out in the Act – see above.

Section 43(2) is also engaged when disclosure would, or would be likely to, prejudice the commercial interests of any legal person (an individual, a company, the public authority itself or any other legal entity).

Under FOIA the 'public interest' is not the same as what might be of interest to the public. In balancing the public interest in disclosure, we consider the greater good or benefit to the community if the information is released or not. The 'right to know' must be balanced against the need to enable effective government and to serve the best interests of the public.

Considerations favouring disclosure:

There is a clear public interest in the release of information that helps demonstrate the work of organisations supporting public bodies providing services.

Considerations favouring non-disclosure:

Conversely the disclosure of this same information would increase the risk of criminal activity, violent crime, or other incidents if made public and seen by those intent on causing harm.

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It is not in the public interest to release information that could be directly used to harm or plan harm to staff or clients.

It is not in the public interest to release information that could be directly used to commit crimes.

The floor plans are not key to understanding the work being undertaken, as set out in the documentation we are able to release.

The public interest favours maintaining the exemption provisions of s.31(1)(a) and s.38(1)(b) and Section 43(2).

